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Attorneys for Defendants  
 ESTHER RENAY DEAN, also sued  
 as Dat Damn Dean, and  
 SONGS OF UNIVERSAL, INC.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

JULIUS JOHNSON, an individual,	)	Case No. 2:23-cv-5061-PA-AFMx
	)	
Plaintiff,	)	
	)	
v.	)	DEFENDANTS ESTHER RENAY
	)	DEAN AND SONGS OF UNIVERSAL,
ONIKA TANYA MARAJ P/K/A NICKI	)	INC.'S ANSWER TO PLAINTIFF'S
MINAJ, an individual; UNIVERSAL	)	THIRD AMENDED THIRD
MUSIC GROUP, INC., a Delaware	)	AMENDED COMPLAINT
corporation; SONGS OF UNIVERSAL,	)	
INC., a California corporation;	)	
MICHAEL LEN WILLIAMS II P/K/A	)	DEMAND FOR JURY TRIAL
MIKE WILL MADE IT, an individual;	)	
KAZARION FOWLER P/K/A SKOOLY,	)	
an individual; MONEY MACK MUSIC	)	
INC, a Louisiana corporation;	)	
HARAJUKU BARBIE MUSIC, LLC, a	)	
Delaware limited liability company;	)	
ESTHER RENAY DEAN P/K/A ESTER	)	
DEAN, an individual; MARCUS BELL,	)	
an individual; SOUNDS FROM	)	
EARDRUMMERS LLC, a Georgia	)	
Corporation; WBM MUSIC CORP., a	)	
Delaware Corporation; DAT DAMN	)	
DEAN; and DOES 1-10, inclusive,	)	
	)	
Defendants.	)	

Defendants Esther Renay Dean, also sued as Dat Damn Dean (“Ms. Dean”), and Songs of Universal, Inc. (“Songs of Universal”) (collectively, “Defendants”) hereby answer the Third Amended Complaint of plaintiff Julius Johnson (“Plaintiff”). Except as specifically admitted or qualified below, Defendants deny each of the allegations in Plaintiff’s Third Amended Complaint.

### **“JURISDICTION AND VENUE”<sup>1</sup>**

1. Paragraph 1 contains legal conclusions to which no response is required. To the extent any response is required, Defendants admit that this Court has subject matter jurisdiction over “copyright infringement and related claims pursuant to 17 U.S.C. §§ 501 *et. seq.*” and “violations of the Digital Millennium Copyright Act and related claims pursuant to 17 U.S.C. §§ 1201 *et. seq.*” pursuant to 28 U.S.C. §§ 1331 and 1338(a). Defendants deny that the Third Amended Complaint states any such valid claims and deny that Plaintiff is entitled to any of the relief sought in the Third Amended Complaint. Except as expressly admitted, Defendants deny the allegations in Paragraph 1.

2. Paragraph 2 contains legal conclusions to which no response is required. To the extent any response is required, Defendants aver that this Paragraph of the Third Amended Complaint sets forth allegations against all defendants in this action collectively. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph as to defendants other than Defendants and on that basis deny such allegations. Songs of Universal does not contest personal jurisdiction over it. Except as expressly admitted, Defendants deny the allegations in Paragraph 2.

3. Paragraph 3 contains legal conclusions to which no response is required. To the extent any response is required, Defendants aver that this Paragraph of the

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<sup>1</sup> Defendants include the section headings from the Third Amended Complaint in this Answer purely for ease of organization; to the extent those headings include any allegations of fact, Defendants deny each and every allegation thereof.

1 Third Amended Complaint sets forth allegations against all defendants in this action  
2 collectively. Defendants are without knowledge or information sufficient to form a  
3 belief as to the truth of the allegations of this Paragraph as to defendants other than  
4 Defendants and on that basis deny such allegations. Defendants do not contest venue  
5 in this District or personal jurisdiction over them. Except as expressly admitted,  
6 Defendants deny the allegations in Paragraph 3.

7 **“PARTIES”**

8 4. Defendants lack knowledge or information sufficient to form a belief as  
9 to the truth of the allegations contained in Paragraph 4, and on that basis deny each  
10 and every allegation contained therein.

11 5. Defendants lack knowledge or information sufficient to form a belief as  
12 to the truth of the allegations contained in Paragraph 5, and on that basis deny each  
13 and every allegation contained therein.

14 6. Defendants lack knowledge or information sufficient to form a belief as  
15 to the truth of the allegations contained in Paragraph 6, and on that basis deny each  
16 and every allegation contained therein.

17 7. Paragraph 7 contains legal conclusions to which no response is required.  
18 To the extent any response is required, Defendants lack knowledge or information  
19 sufficient to form a belief as to the truth of the allegations contained in Paragraph 7,  
20 and on that basis deny each and every allegation contained therein.

21 8. Paragraph 8 contains legal conclusions to which no response is required.  
22 To the extent any response is required, Songs of Universal admits it is a music  
23 publishing company and maintains offices in the County of Los Angeles, California,  
24 but denies that it “participated in, facilitated, or encouraged” any wrongful conduct,  
25 including without limitation any allegedly “wrongful conduct” alleged in the Third  
26 Amended Complaint, and denies all other allegations of this Paragraph. Ms. Dean  
27 lacks knowledge or information sufficient to form a belief as to the truth of the

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1 allegations contained in Paragraph 8, and on that basis denies each and every  
2 allegation contained therein.

3 9. Defendants lack knowledge or information sufficient to form a belief as  
4 to the truth of the allegations contained in Paragraph 9, and on that basis deny each  
5 and every allegation contained therein.

6 10. Defendants lack knowledge or information sufficient to form a belief as  
7 to the truth of the allegations contained in Paragraph 10, and on that basis deny each  
8 and every allegation contained therein.

9 11. Defendants lack knowledge or information sufficient to form a belief as  
10 to the truth of the allegations contained in Paragraph 11, and on that basis deny each  
11 and every allegation contained therein.

12 12. Defendants lack knowledge or information sufficient to form a belief as  
13 to the truth of the allegations contained in Paragraph 12, and on that basis deny each  
14 and every allegation contained therein.

15 13. Defendants lack knowledge or information sufficient to form a belief as  
16 to the truth of the allegations contained in Paragraph 13, and on that basis deny each  
17 and every allegation contained therein.

18 14. Paragraph 14 contains legal conclusions to which no response is required.  
19 To the extent any response is required, Ms. Dean admits she is a singer, songwriter,  
20 and record producer, but denies that she “participated in, facilitated, or encouraged”  
21 any wrongful conduct, including without limitation any allegedly “wrongful conduct”  
22 alleged in the Third Amended Complaint, and denies all other allegations of this  
23 Paragraph. Songs of Universal admits that Ms. Dean is a singer, songwriter, and  
24 record producer, but lacks knowledge or information sufficient to form a belief as to  
25 the truth of the remaining allegations contained in Paragraph 14, and on that basis  
26 denies each and every remaining allegation contained therein.

27 15. Ms. Dean admits that “Dat Damn Dean” is a name under which she owns  
28 or licenses musical compositions, but denies that she, including as Dat Damn Dean,

1 “participated in, facilitated, or encouraged” any wrongful conduct, including without  
2 limitation any allegedly “wrongful conduct” alleged in the Third Amended Complaint,  
3 and denies all other allegations of this Paragraph. Songs of Universal lacks knowledge  
4 or information sufficient to form a belief as to the truth of the remaining allegations  
5 contained in Paragraph 15, and on that basis denies each and every remaining  
6 allegation contained therein.

7 16. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 16, and on that basis deny each  
9 and every allegation contained therein.

10 17. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 17, and on that basis deny each  
12 and every allegation contained therein. Defendants further aver that this Paragraph  
13 erroneously refers to the “SAC” rather than the Third Amended Complaint.

14 **“FACTS COMMON TO ALL CLAIMS”**

15 ***“The Copyrighted Sound Recording and Composition”***

16 18. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 18, and on that basis deny each  
18 and every allegation contained therein.

19 19. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 19, and on that basis deny each  
21 and every allegation contained therein.

22 20. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 20, and on that basis deny each  
24 and every allegation contained therein.

25 21. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 21, and on that basis deny each  
27 and every allegation contained therein.

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1           22. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 22, and on that basis deny each  
3 and every allegation contained therein.

4           23. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 23, and on that basis deny each  
6 and every allegation contained therein.

7           24. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 24, and on that basis deny each  
9 and every allegation contained therein.

10          25. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 25, and on that basis deny each  
12 and every allegation contained therein.

13          26. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 26, and on that basis deny each  
15 and every allegation contained therein.

16          27. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 27, and on that basis deny each  
18 and every allegation contained therein.

19          28. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 28, and on that basis deny each  
21 and every allegation contained therein.

22          29. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 29, and on that basis deny each  
24 and every allegation contained therein.

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1           30. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 30, and on that basis deny each  
3 and every allegation contained therein.<sup>2</sup>

4           31. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 31, and on that basis deny each  
6 and every allegation contained therein.

7           32. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 32, and on that basis deny each  
9 and every allegation contained therein.

10          33. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 33, and on that basis deny each  
12 and every allegation contained therein.

13          34. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 34, and on that basis deny each  
15 and every allegation contained therein.

16          35. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 35, and on that basis deny each  
18 and every allegation contained therein.

19          36. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 36, and on that basis deny each  
21 and every allegation contained therein.

22          37. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 37, and on that basis deny each  
24 and every allegation contained therein.

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27           <sup>2</sup> This Answer's responses to allegations in paragraphs in Plaintiff's Third  
28 Amended Complaint also apply to assertions in the footnotes to those paragraphs.



1           38. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 38, and on that basis deny each  
3 and every allegation contained therein.

4           39. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 39, and on that basis deny each  
6 and every allegation contained therein.

7           40. Paragraph 40 contains legal conclusions to which no response is required.  
8 To the extent any response is required, Defendants aver that this Paragraph sets forth  
9 allegations against all defendants in this action collectively. Defendants are without  
10 knowledge or information sufficient to form a belief as to the truth of the allegations  
11 of this Paragraph as to defendants other than Defendants and on that basis deny such  
12 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
13 40, Defendants deny each and every such allegation.

14           41. Paragraph 41 contains legal conclusions to which no response is required.  
15 To the extent any response is required, Defendants aver that this Paragraph sets forth  
16 allegations against all defendants in this action collectively. Defendants are without  
17 knowledge or information sufficient to form a belief as to the truth of the allegations  
18 of this Paragraph as to defendants other than Defendants and on that basis deny such  
19 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
20 41, Defendants deny each and every such allegation.

21           42. Defendants lack knowledge or information sufficient to form a belief as  
22 to the truth of the allegations contained in Paragraph 42, and on that basis deny each  
23 and every allegation contained therein.

24           43. Defendants lack knowledge or information sufficient to form a belief as  
25 to the truth of the allegations contained in Paragraph 43, and on that basis deny each  
26 and every allegation contained therein.

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1           44. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 44, and on that basis deny each  
3 and every allegation contained therein.

4           45. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 45, and on that basis deny each  
6 and every allegation contained therein.

7           46. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 46, and on that basis deny each  
9 and every allegation contained therein.

10          47. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 47, and on that basis deny each  
12 and every allegation contained therein.

13          48. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 48, and on that basis deny each  
15 and every allegation contained therein.

16          49. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 49, and on that basis deny each  
18 and every allegation contained therein.

19          50. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 50, and on that basis deny each  
21 and every allegation contained therein.

22          51. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 51, and on that basis deny each  
24 and every allegation contained therein.

25          52. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 52, and on that basis deny each  
27 and every allegation contained therein.

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1           53. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 53, and on that basis deny each  
3 and every allegation contained therein.

4           54. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 54, and on that basis deny each  
6 and every allegation contained therein.

7           55. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 55, and on that basis deny each  
9 and every allegation contained therein.

10          56. Songs of Universal denies the allegations in Paragraph 56, including but  
11 not limited to the allegations that “*I Lied*” is an “infringing work” and that “*The*  
12 *Pinkprint*” is an “infringing album.” Ms. Dean denies that “*I Lied*” is an “infringing  
13 work” and that “*The Pinkprint*” is an “infringing album,” lacks knowledge or  
14 information sufficient to form a belief as to the truth of the remaining allegations  
15 contained in Paragraph 56, and on that basis denies each and every remaining  
16 allegation contained therein.

17          57. Defendants deny that “*I Lied*” is an “infringing work” and that “*The*  
18 *Pinkprint*” is an “infringing album,” lack knowledge or information sufficient to form  
19 a belief as to the truth of the remaining allegations contained in Paragraph 57, and on  
20 that basis deny each and every remaining allegation contained therein.

21          58. Defendants lack knowledge or information sufficient to form a belief as  
22 to the truth of the allegations contained in Paragraph 58, and on that basis deny each  
23 and every allegation contained therein.

24          59. Defendants lack knowledge or information sufficient to form a belief as  
25 to the truth of the allegations contained in Paragraph 59, and on that basis deny each  
26 and every allegation contained therein.

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1           60. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 60, and on that basis deny each  
3 and every allegation contained therein.

4           61. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 61, and on that basis deny each  
6 and every allegation contained therein.

7           62. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 62, and on that basis deny each  
9 and every allegation contained therein.

10          63. Ms. Dean admits that in or around December of 2014, she, directly or  
11 indirectly, licensed a portion of the composition "*I Lied*," and denies the remaining  
12 allegations in this Paragraph 63, including but not limited to the allegations that "*I*  
13 *Lied*" is an "infringing work" and that "*The Pinkprint*" is an "infringing album."  
14 Songs of Universal denies that "*I Lied*" is an "infringing work" and that "*The*  
15 *Pinkprint*" is an "infringing album," lacks knowledge or information sufficient to form  
16 a belief as to the truth of the remaining allegations contained in Paragraph 63, and on  
17 that basis denies each and every remaining allegation contained therein.

18          64. Ms. Dean admits that in or around December of 2014, she, directly or  
19 indirectly, licensed a portion of the composition "*I Lied*," and denies the remaining  
20 allegations in this Paragraph 64, including but not limited to the allegations that "*I*  
21 *Lied*" is an "infringing work" and that "*The Pinkprint*" is an "infringing album."  
22 Songs of Universal denies that "*I Lied*" is an "infringing work" and that "*The*  
23 *Pinkprint*" is an "infringing album," lacks knowledge or information sufficient to form  
24 a belief as to the truth of the remaining allegations contained in Paragraph 64, and on  
25 that basis denies each and every remaining allegation contained therein.

26          65. Defendants deny that "*I Lied*" is an "infringing work" and that "*The*  
27 *Pinkprint*" is an "infringing album," and Defendants lack knowledge or information  
28 sufficient to form a belief as to the truth of the remaining allegations contained in

1 Paragraph 65, and on that basis deny each and every remaining allegation contained  
2 therein.

3 66. Defendants lack knowledge or information sufficient to form a belief as  
4 to the truth of the allegations contained in Paragraph 66, and on that basis deny each  
5 and every allegation contained therein.

6 67. Defendants lack knowledge or information sufficient to form a belief as  
7 to the truth of the allegations contained in Paragraph 67, and on that basis deny each  
8 and every allegation contained therein.

9 68. Defendants lack knowledge or information sufficient to form a belief as  
10 to the truth of the allegations contained in Paragraph 68, and on that basis deny each  
11 and every allegation contained therein.

12 69. Defendants lack knowledge or information sufficient to form a belief as  
13 to the truth of the allegations contained in Paragraph 69, and on that basis deny each  
14 and every allegation contained therein.

15 70. Defendants lack knowledge or information sufficient to form a belief as  
16 to the truth of the allegations contained in Paragraph 70, and on that basis deny each  
17 and every allegation contained therein.

18 71. Defendants lack knowledge or information sufficient to form a belief as  
19 to the truth of the allegations contained in Paragraph 71, and on that basis deny each  
20 and every allegation contained therein.

21 72. Paragraph 72 contains legal conclusions to which no response is required.  
22 To the extent any response is required, Defendants object that the allegations in this  
23 Paragraph require the opinion of an expert and purporting to require that Defendants  
24 respond at this time is improper and premature under Federal Rule of Civil Procedure  
25 26, and as to any non-expert allegations in this Paragraph, Defendants deny the  
26 allegations in Paragraph 72.

27 73. Defendants deny the allegations in Paragraph 73.

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1           74. Defendants object that the allegations in this Paragraph require the  
2 opinion of an expert and purporting to require that Defendants respond at this time is  
3 improper and premature under Federal Rule of Civil Procedure 26, and as to any non-  
4 expert allegations in this Paragraph, Defendants lack knowledge or information  
5 sufficient to form a belief as to the truth of the allegations contained in Paragraph 74,  
6 and on that basis deny each and every allegation contained therein.

7           75. Defendants object that the allegations in this Paragraph require the  
8 opinion of an expert and purporting to require that Defendants respond at this time is  
9 improper and premature under Federal Rule of Civil Procedure 26, and as to any non-  
10 expert allegations in this Paragraph, Defendants lack knowledge or information  
11 sufficient to form a belief as to the truth of the allegations contained in Paragraph 75,  
12 and on that basis deny each and every allegation contained therein.

13           76. Paragraph 76 contains legal conclusions to which no response is required.  
14 To the extent any response is required, Defendants object that the allegations in this  
15 Paragraph require the opinion of an expert and purporting to require that Defendants  
16 respond at this time is improper and premature under Federal Rule of Civil Procedure  
17 26, and as to any non-expert allegations in this Paragraph, Defendants lack knowledge  
18 or information sufficient to form a belief as to the truth of the allegations contained in  
19 Paragraph 76, and on that basis denies each and every allegation contained therein.

20           77. Paragraph 77 contains legal conclusions to which no response is required.  
21 To the extent any response is required, Defendants object that the allegations in this  
22 Paragraph require the opinion of an expert and purporting to require that Defendants  
23 respond at this time is improper and premature under Federal Rule of Civil Procedure  
24 26, and as to any non-expert allegations in this Paragraph, Defendants deny the  
25 allegations in Paragraph 77.

26           78. Paragraph 78 contains legal conclusions to which no response is required.  
27 To the extent any response is required, Defendants object that the allegations in this  
28 Paragraph require the opinion of an expert and purporting to require that Defendants

1 respond at this time is improper and premature under Federal Rule of Civil Procedure  
2 26, and as to any non-expert allegations in this Paragraph, Defendants lack knowledge  
3 or information sufficient to form a belief as to the truth of the allegations contained in  
4 Paragraph 78, and on that basis deny each and every allegation contained therein.

5 79. Paragraph 79 contains legal conclusions to which no response is required.  
6 To the extent any response is required, Defendants object that the allegations in this  
7 Paragraph require the opinion of an expert and purporting to require that Defendants  
8 respond at this time is improper and premature under Federal Rule of Civil Procedure  
9 26, and as to any non-expert allegations in this Paragraph, Defendants deny the  
10 allegations in Paragraph 79.

11 80. This Paragraph of the Third Amended Complaint sets forth allegations  
12 against all defendants in this action collectively. Defendants are without knowledge  
13 or information sufficient to form a belief as to the truth of the allegations of this  
14 Paragraph as to defendants other than Defendants, and on that basis deny such  
15 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
16 80, Defendants object that the allegations in this Paragraph require the opinion of an  
17 expert and purporting to require that Defendants respond at this time is improper and  
18 premature under Federal Rule of Civil Procedure 26, and as to any non-expert  
19 allegations in this Paragraph, Defendants deny any such allegations.

20 81. This Paragraph of the Third Amended Complaint sets forth allegations  
21 against all defendants in this action collectively. Defendants are without knowledge  
22 or information sufficient to form a belief as to the truth of the allegations of this  
23 Paragraph as to defendants other than Defendants, and on that basis deny those  
24 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
25 81, Defendants object that the allegations in this Paragraph require the opinion of an  
26 expert and purporting to require that Defendants respond at this time is improper and  
27 premature under Federal Rule of Civil Procedure 26, and as to any non-expert  
28 allegations in this Paragraph, Defendants deny any such allegations.

1           82. This Paragraph of the Third Amended Complaint sets forth allegations  
2 against all defendants in this action collectively. Defendants are without knowledge  
3 or information sufficient to form a belief as to the truth of the allegations of this  
4 Paragraph as to defendants other than Defendants, and on that basis deny those  
5 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
6 82, Defendants object that the allegations in this Paragraph require the opinion of an  
7 expert and purporting to require that Defendants respond at this time is improper and  
8 premature under Federal Rule of Civil Procedure 26, and as to any non-expert  
9 allegations in this Paragraph, Defendants deny any such allegations.

10           83. Paragraph 83 contains legal conclusions to which no response is required.  
11 To the extent any response is required, this Paragraph of the Third Amended  
12 Complaint sets forth allegations against all defendants in this action collectively.  
13 Defendants are without knowledge or information sufficient to form a belief as to the  
14 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
15 on that basis deny those allegations. As to allegations pertaining specifically to  
16 Defendants in this Paragraph 83, Defendants object that the allegations in this  
17 Paragraph require the opinion of an expert and purporting to require that Defendants  
18 respond at this time is improper and premature under Federal Rule of Civil Procedure  
19 26, and as to any non-expert allegations in this Paragraph, Defendants deny any such  
20 allegations.

21           84. Paragraph 84 contains legal conclusions to which no response is required.  
22 To the extent any response is required, Defendants deny any such allegations.

23           85. Paragraph 85 contains legal conclusions to which no response is required.  
24 To the extent any response is required, this Paragraph of the Third Amended  
25 Complaint sets forth allegations against all defendants in this action collectively.  
26 Defendants are without knowledge or information sufficient to form a belief as to the  
27 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
28 on that basis deny those allegations. As to allegations pertaining specifically to



1 Defendants in this Paragraph 85, Defendants object that the allegations in this  
2 Paragraph require the opinion of an expert and purporting to require that Defendants  
3 respond at this time is improper and premature under Federal Rule of Civil Procedure  
4 26, and as to any non-expert allegations in this Paragraph, Defendants deny any such  
5 allegations.

6 86. Paragraph 86 contains legal conclusions to which no response is required.  
7 To the extent any response is required, this Paragraph of the Third Amended  
8 Complaint sets forth allegations against all defendants in this action collectively.  
9 Defendants are without knowledge or information sufficient to form a belief as to the  
10 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
11 on that basis and denies those allegations. As to allegations pertaining specifically to  
12 Defendants in this Paragraph 86, Defendants deny any such allegations.

13 87. Paragraph 87 contains legal conclusions to which no response is required.  
14 To the extent any response is required, this Paragraph of the Third Amended  
15 Complaint sets forth allegations against all defendants in this action collectively.  
16 Defendants are without knowledge or information sufficient to form a belief as to the  
17 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
18 on that basis and denies those allegations. As to allegations pertaining specifically to  
19 Defendants in this Paragraph 87, Defendants object that the allegations in this  
20 Paragraph require the opinion of an expert and purporting to require that Defendants  
21 respond at this time is improper and premature under Federal Rule of Civil Procedure  
22 26, and as to any non-expert allegations in this Paragraph, Defendants deny any such  
23 allegations.

24 88. This Paragraph of the Third Amended Complaint sets forth allegations  
25 against all defendants in this action collectively. Defendants are without knowledge  
26 or information sufficient to form a belief as to the truth of the allegations of this  
27 Paragraph as to defendants other than Defendants, and on that basis deny those

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1 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
2 88, Defendants deny any such allegations.

3 89. This Paragraph of the Third Amended Complaint sets forth allegations  
4 against all defendants in this action collectively. Defendants are without knowledge  
5 or information sufficient to form a belief as to the truth of the allegations of this  
6 Paragraph as to defendants other than Defendants, and on that basis deny those  
7 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
8 89, Defendants admit they did not obtain a license from Plaintiff, deny any such  
9 license was required, and deny the remaining allegations contained therein.

10 90. Paragraph 90 contains legal conclusions to which no response is required.  
11 To the extent any response is required, this Paragraph of the Third Amended  
12 Complaint sets forth allegations against all defendants in this action collectively.  
13 Defendants are without knowledge or information sufficient to form a belief as to the  
14 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
15 on that basis and denies those allegations. As to allegations pertaining specifically to  
16 Defendants in this Paragraph 90, Defendants object that the allegations in this  
17 Paragraph require the opinion of an expert and purporting to require that Defendants  
18 respond at this time is improper and premature under Federal Rule of Civil Procedure  
19 26, and as to any non-expert allegations in this Paragraph, Defendants deny any such  
20 allegations.

21 91. This Paragraph of the Third Amended Complaint sets forth allegations  
22 against all defendants in this action collectively. Defendants are without knowledge  
23 or information sufficient to form a belief as to the truth of the allegations of this  
24 Paragraph as to defendants other than Defendants, and on that basis deny those  
25 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
26 91, Defendants deny Plaintiff is entitled to any credit or compensation with respect to  
27 “*I Lied*” and “*The Pinkprint*,” or either of them, and deny the remaining allegations  
28 contained therein.

1           92. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 92, and on that basis deny each  
3 and every allegation contained therein.

4           93. This Paragraph of the Third Amended Complaint sets forth allegations  
5 against all defendants in this action collectively. Defendants are without knowledge  
6 or information sufficient to form a belief as to the truth of the allegations of this  
7 Paragraph as to defendants other than Defendants, and on that basis deny those  
8 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
9 93, Defendants deny any such allegations.

10          94. This Paragraph of the Third Amended Complaint sets forth allegations  
11 against all defendants in this action collectively. Defendants are without knowledge  
12 or information sufficient to form a belief as to the truth of the allegations of this  
13 Paragraph as to defendants other than Defendants, and on that basis deny those  
14 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
15 94, Defendants deny any such allegations.

16          95. This Paragraph of the Third Amended Complaint sets forth allegations  
17 against all defendants in this action collectively. Defendants are without knowledge  
18 or information sufficient to form a belief as to the truth of the allegations of this  
19 Paragraph as to defendants other than Defendants, and on that basis deny those  
20 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
21 95, Defendants deny any such allegations.

22          96. Defendants admit that Songs of Universal was involved, directly or  
23 indirectly, in licensing a portion of the composition "*I Lied*," and deny the remaining  
24 allegations in this Paragraph 96, including but not limited to the allegation that "*I*  
25 *Lied*" is an "infringing work."

26          97. Defendants deny that "*I Lied*" is an "infringing work," lack knowledge  
27 or information sufficient to form a belief as to the truth of the remaining allegations

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1 contained in Paragraph 97, and on that basis deny each and every remaining allegation  
2 contained therein.

3       98. This Paragraph of the Third Amended Complaint sets forth allegations  
4 against all defendants in this action collectively. Defendants are without knowledge  
5 or information sufficient to form a belief as to the truth of the allegations of this  
6 Paragraph as to defendants other than Defendants, and on that basis deny those  
7 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
8 98, Defendants deny any such allegations.

9       99. This Paragraph of the Third Amended Complaint sets forth allegations  
10 against all defendants in this action collectively. Defendants are without knowledge  
11 or information sufficient to form a belief as to the truth of the allegations of this  
12 Paragraph as to defendants other than Defendants, and on that basis deny those  
13 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
14 99, Defendants deny any such allegations.

15       100. This Paragraph of the Third Amended Complaint sets forth allegations  
16 against all defendants in this action collectively. Defendants are without knowledge  
17 or information sufficient to form a belief as to the truth of the allegations of this  
18 Paragraph as to defendants other than Defendants, and on that basis deny those  
19 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
20 100, Defendants deny any such allegations.

21       101. This Paragraph of the Third Amended Complaint sets forth allegations  
22 against all defendants in this action collectively. Defendants are without knowledge  
23 or information sufficient to form a belief as to the truth of the allegations of this  
24 Paragraph as to defendants other than Defendants, and on that basis deny those  
25 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
26 101, Defendants deny any such allegations.

27       102. This Paragraph of the Third Amended Complaint sets forth allegations  
28 against all defendants in this action collectively. Defendants are without knowledge

1 or information sufficient to form a belief as to the truth of the allegations of this  
2 Paragraph as to defendants other than Defendants, and on that basis deny those  
3 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
4 102, Defendants deny any such allegations.

5 103. Defendants admit that Ms. Dean was involved, directly or indirectly, in  
6 licensing a portion of the composition "*I Lied*," and deny the remaining allegations in  
7 this Paragraph 103, including but not limited to the allegation that "*I Lied*" is an  
8 "infringing work."

9 104. Defendants admit that Ms. Dean, as Dat Damn Dean, was involved,  
10 directly or indirectly, in licensing a portion of the composition "*I Lied*," and deny the  
11 remaining allegations in this Paragraph 104, including but not limited to the allegation  
12 that "*I Lied*" is an "infringing work."

13 105. This Paragraph of the Third Amended Complaint sets forth allegations  
14 against all defendants in this action collectively. Defendants are without knowledge  
15 or information sufficient to form a belief as to the truth of the allegations of this  
16 Paragraph as to defendants other than Defendants, and on that basis deny those  
17 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
18 105, Defendants deny any such allegations.

19 106. This Paragraph of the Third Amended Complaint sets forth allegations  
20 against all defendants in this action collectively. Defendants are without knowledge  
21 or information sufficient to form a belief as to the truth of the allegations of this  
22 Paragraph as to defendants other than Defendants, and on that basis deny those  
23 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
24 106, Defendants deny any such allegations.

25 107. This Paragraph of the Third Amended Complaint sets forth allegations  
26 against all defendants in this action collectively. Defendants are without knowledge  
27 or information sufficient to form a belief as to the truth of the allegations of this  
28 Paragraph as to defendants other than Defendants, and on that basis deny those

1 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
2 107, Defendants deny any such allegations.

3 108. This Paragraph of the Third Amended Complaint sets forth allegations  
4 against all defendants in this action collectively. Defendants are without knowledge  
5 or information sufficient to form a belief as to the truth of the allegations of this  
6 Paragraph as to defendants other than Defendants, and on that basis deny those  
7 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
8 108, Defendants deny any such allegations.

9 109. Defendants deny that “*I Lied*” is an “infringing work” and lack  
10 knowledge or information sufficient to form a belief as to the truth of the remaining  
11 allegations contained in Paragraph 109, and on that basis deny each and every  
12 remaining allegation contained therein.

13 110. This Paragraph of the Third Amended Complaint sets forth allegations  
14 against certain other defendants, as well as all defendants in this action collectively.  
15 Defendants are without knowledge or information sufficient to form a belief as to the  
16 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
17 on that basis deny those allegations. As to allegations pertaining specifically to  
18 Defendants in this Paragraph 110, Defendants deny any such allegations.

19 111. This Paragraph of the Third Amended Complaint sets forth allegations  
20 against certain other defendants, as well as all defendants in this action collectively.  
21 Defendants are without knowledge or information sufficient to form a belief as to the  
22 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
23 on that basis deny those allegations. As to allegations pertaining specifically to  
24 Defendants in this Paragraph 111, Defendants deny any such allegations.

25 112. This Paragraph of the Third Amended Complaint sets forth allegations  
26 against certain other defendants, as well as all defendants in this action collectively.  
27 Defendants are without knowledge or information sufficient to form a belief as to the  
28 truth of the allegations of this Paragraph as to defendants other than Defendants, and

1 on that basis deny those allegations. As to allegations pertaining specifically to  
2 Defendants in this Paragraph 112, Defendants deny any such allegations.

3 113. This Paragraph of the Third Amended Complaint sets forth allegations  
4 against certain other defendants, as well as all defendants in this action collectively.  
5 Defendants are without knowledge or information sufficient to form a belief as to the  
6 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
7 on that basis deny those allegations. As to allegations pertaining specifically to  
8 Defendants in this Paragraph 113, Defendants deny any such allegations.

9 114. This Paragraph of the Third Amended Complaint sets forth allegations  
10 against certain other defendants, as well as all defendants in this action collectively.  
11 Defendants are without knowledge or information sufficient to form a belief as to the  
12 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
13 on that basis deny those allegations. As to allegations pertaining specifically to  
14 Defendants in this Paragraph 114, Defendants deny any such allegations.

15 115. Defendants admit that Ms. Dean was involved, directly or indirectly, in  
16 licensing a portion of the composition "*I Lied*," and denies the remaining allegations  
17 in this Paragraph 115, including but not limited to the allegation that "*I Lied*" is an  
18 "infringing work."

19 116. Defendants admit that Ms. Dean, as Dat Damn Dean, was involved,  
20 directly or indirectly, in licensing a portion of the composition "*I Lied*," and denies  
21 the remaining allegations in this Paragraph 116, including but not limited to the  
22 allegation that "*I Lied*" is an "infringing work."

23 117. This Paragraph of the Third Amended Complaint sets forth allegations  
24 against certain other defendants, as well as all defendants in this action collectively.  
25 Defendants are without knowledge or information sufficient to form a belief as to the  
26 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
27 on that basis deny those allegations. As to allegations pertaining specifically to  
28 Defendants in this Paragraph 117, Defendants deny any such allegations.



1           118. This Paragraph of the Third Amended Complaint sets forth allegations  
2 against certain other defendants, as well as all defendants in this action collectively.  
3 Defendants are without knowledge or information sufficient to form a belief as to the  
4 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
5 on that basis deny those allegations. As to allegations pertaining specifically to  
6 Defendants in this Paragraph 118, Defendants deny any such allegations.

7           119. This Paragraph of the Third Amended Complaint sets forth allegations  
8 against certain other defendants, as well as all defendants in this action collectively.  
9 Defendants are without knowledge or information sufficient to form a belief as to the  
10 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
11 on that basis deny those allegations. As to allegations pertaining specifically to  
12 Defendants in this Paragraph 119, Defendants deny any such allegations.

13           120. Songs of Universal admits that “*I Lied*” was “performed or broadcast” in  
14 California, denies that the foregoing required the “permission or consent” of Plaintiff,  
15 and denies all other allegations of this Paragraph 120. Ms. Dean lacks knowledge or  
16 information sufficient to form a belief as to the truth of the allegations contained in  
17 Paragraph 120, and on that basis denies each and every allegation contained therein.

18           121. Defendants lack knowledge or information sufficient to form a belief as  
19 to the truth of the allegations contained in Paragraph 121, and on that basis deny each  
20 and every allegation contained therein.

21           122. This Paragraph of the Third Amended Complaint sets forth allegations  
22 against certain other defendants, as well as all defendants in this action collectively.  
23 Defendants are without knowledge or information sufficient to form a belief as to the  
24 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
25 on that basis deny those allegations. As to allegations pertaining specifically to  
26 Defendants in this Paragraph 122, Defendants deny any such allegations.

27           123. This Paragraph of the Third Amended Complaint sets forth allegations  
28 against certain other defendants, as well as all defendants in this action collectively.

1 Defendants are without knowledge or information sufficient to form a belief as to the  
2 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
3 on that basis deny those allegations. As to allegations pertaining specifically to  
4 Defendants in this Paragraph 123, Defendants deny any such allegations.

5 124. This Paragraph of the Third Amended Complaint sets forth allegations  
6 against certain other defendants, as well as all defendants in this action collectively.  
7 Defendants are without knowledge or information sufficient to form a belief as to the  
8 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
9 on that basis deny those allegations. As to allegations pertaining specifically to  
10 Defendants in this Paragraph 124, Defendants deny any such allegations.

11 125. This Paragraph of the Third Amended Complaint sets forth allegations  
12 against certain other defendants, as well as all defendants in this action collectively.  
13 Defendants are without knowledge or information sufficient to form a belief as to the  
14 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
15 on that basis deny those allegations. As to allegations pertaining specifically to  
16 Defendants in this Paragraph 125, Defendants deny any such allegations.

17 126. This Paragraph of the Third Amended Complaint sets forth allegations  
18 against certain other defendants, as well as all defendants in this action collectively.  
19 Defendants are without knowledge or information sufficient to form a belief as to the  
20 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
21 on that basis deny those allegations. As to allegations pertaining specifically to  
22 Defendants in this Paragraph 126, Defendants deny any such allegations.

23 127. Songs of Universal admits that "*I Lied*" was "performed or broadcast" in  
24 California, denies that the foregoing required the "permission or consent" of Plaintiff,  
25 and denies all other allegations of this Paragraph 127. Ms. Dean lacks knowledge or  
26 information sufficient to form a belief as to the truth of the allegations contained in  
27 Paragraph 127, and on that basis denies each and every allegation contained therein.

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1           128. Songs of Universal admits that “*I Lied*” was “performed or broadcast” in  
2 California, denies that the foregoing required the “permission or consent” of Plaintiff,  
3 and denies all other allegations of this Paragraph 128. Ms. Dean lacks knowledge or  
4 information sufficient to form a belief as to the truth of the allegations contained in  
5 Paragraph 128, and on that basis denies each and every allegation contained therein.

6           129. This Paragraph of the Third Amended Complaint sets forth allegations  
7 against certain other defendants, as well as all defendants in this action collectively.  
8 Defendants are without knowledge or information sufficient to form a belief as to the  
9 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
10 on that basis deny those allegations. As to allegations pertaining specifically to  
11 Defendants in this Paragraph 129, Defendants deny any such allegations.

12           130. This Paragraph of the Third Amended Complaint sets forth allegations  
13 against certain other defendants, as well as all defendants in this action collectively.  
14 Defendants are without knowledge or information sufficient to form a belief as to the  
15 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
16 on that basis deny those allegations. As to allegations pertaining specifically to  
17 Defendants in this Paragraph 130, Defendants deny any such allegations.

18           131. This Paragraph of the Third Amended Complaint sets forth allegations  
19 against certain other defendants, as well as all defendants in this action collectively.  
20 Defendants are without knowledge or information sufficient to form a belief as to the  
21 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
22 on that basis deny those allegations. As to allegations pertaining specifically to  
23 Defendants in this Paragraph 131, Defendants deny any such allegations.

24           132. Songs of Universal denies the allegations in Paragraph 132. Ms. Dean  
25 lacks knowledge or information sufficient to form a belief as to the truth of the  
26 allegations contained in Paragraph 132, and on that basis denies each and every  
27 allegation contained therein.

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1           133. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 133, and on that basis deny each  
3 and every allegation contained therein.

4           134. This Paragraph of the Third Amended Complaint sets forth allegations  
5 against certain other defendants, as well as all defendants in this action collectively.  
6 Defendants are without knowledge or information sufficient to form a belief as to the  
7 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
8 on that basis deny those allegations. As to allegations pertaining specifically to  
9 Defendants in this Paragraph 134, Defendants deny any such allegations.

10           135. This Paragraph of the Third Amended Complaint sets forth allegations  
11 against certain other defendants, as well as all defendants in this action collectively.  
12 Defendants are without knowledge or information sufficient to form a belief as to the  
13 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
14 on that basis deny those allegations. As to allegations pertaining specifically to  
15 Defendants in this Paragraph 135, Defendants deny any such allegations.

16           136. This Paragraph of the Third Amended Complaint sets forth allegations  
17 against certain other defendants, as well as all defendants in this action collectively.  
18 Defendants are without knowledge or information sufficient to form a belief as to the  
19 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
20 on that basis deny those allegations. As to allegations pertaining specifically to  
21 Defendants in this Paragraph 136, Defendants deny any such allegations.

22           137. This Paragraph of the Third Amended Complaint sets forth allegations  
23 against certain other defendants, as well as all defendants in this action collectively.  
24 Defendants are without knowledge or information sufficient to form a belief as to the  
25 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
26 on that basis deny those allegations. As to allegations pertaining specifically to  
27 Defendants in this Paragraph 137, Defendants deny any such allegations.

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1           138. This Paragraph of the Third Amended Complaint sets forth allegations  
2 against certain other defendants, as well as all defendants in this action collectively.  
3 Defendants are without knowledge or information sufficient to form a belief as to the  
4 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
5 on that basis deny those allegations. As to allegations pertaining specifically to  
6 Defendants in this Paragraph 138, Defendants deny any such allegations.

7           139. Defendants admit that Ms. Dean was involved, directly or indirectly, in  
8 licensing a portion of the composition "*I Lied*," Ms. Dean denies the remaining  
9 allegations in this Paragraph 139. Songs of Universal lacks knowledge or information  
10 sufficient to form a belief as to the truth of the allegations contained in Paragraph 139,  
11 and on that basis denies each and every allegation contained therein.

12           140. Defendants admit that Ms. Dean, as Dat Damn Dean, was involved,  
13 directly or indirectly, in licensing a portion of the composition "*I Lied*," Ms. Dean  
14 denies the remaining allegations in this Paragraph 140. Songs of Universal lacks  
15 knowledge or information sufficient to form a belief as to the truth of the allegations  
16 contained in Paragraph 140, and on that basis denies each and every allegation  
17 contained therein.

18           141. This Paragraph of the Third Amended Complaint sets forth allegations  
19 against certain other defendants, as well as all defendants in this action collectively.  
20 Defendants are without knowledge or information sufficient to form a belief as to the  
21 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
22 on that basis deny those allegations. As to allegations pertaining specifically to  
23 Defendants in this Paragraph 141, Defendants deny any such allegations.

24           142. This Paragraph of the Third Amended Complaint sets forth allegations  
25 against certain other defendants, as well as all defendants in this action collectively.  
26 Defendants are without knowledge or information sufficient to form a belief as to the  
27 truth of the allegations of this Paragraph as to defendants other than Defendants, and

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1 on that basis deny those allegations. As to allegations pertaining specifically to  
2 Defendants in this Paragraph 142, Defendants deny any such allegations.

3 143. This Paragraph of the Third Amended Complaint sets forth allegations  
4 against certain other defendants, as well as all defendants in this action collectively.  
5 Defendants are without knowledge or information sufficient to form a belief as to the  
6 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
7 on that basis deny those allegations. As to allegations pertaining specifically to  
8 Defendants in this Paragraph 143, Defendants deny any such allegations.

9 144. Songs of Universal denies the allegations in Paragraph 144. Ms. Dean  
10 denies that “*I Lied*” is an “infringing work,” lacks knowledge or information sufficient  
11 to form a belief as to the truth of the remaining allegations contained in Paragraph  
12 144, and on that basis denies each and every remaining allegation contained therein.

13 145. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the remaining allegations contained in Paragraph 145, and on that basis  
15 deny each and every remaining allegation contained therein.

16 146. This Paragraph of the Third Amended Complaint sets forth allegations  
17 against certain other defendants, as well as all defendants in this action collectively.  
18 Defendants are without knowledge or information sufficient to form a belief as to the  
19 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
20 on that basis deny those allegations. As to allegations pertaining specifically to  
21 Defendants in this Paragraph 146, Defendants deny any such allegations.

22 147. This Paragraph of the Third Amended Complaint sets forth allegations  
23 against certain other defendants, as well as all defendants in this action collectively.  
24 Defendants are without knowledge or information sufficient to form a belief as to the  
25 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
26 on that basis deny those allegations. As to allegations pertaining specifically to  
27 Defendants in this Paragraph 147, Defendants deny any such allegations.

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1           148. This Paragraph of the Third Amended Complaint sets forth allegations  
2 against certain other defendants, as well as all defendants in this action collectively.  
3 Defendants are without knowledge or information sufficient to form a belief as to the  
4 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
5 on that basis deny those allegations. As to allegations pertaining specifically to  
6 Defendants in this Paragraph 148, Defendants deny any such allegations.

7           149. This Paragraph of the Third Amended Complaint sets forth allegations  
8 against certain other defendants, as well as all defendants in this action collectively.  
9 Defendants are without knowledge or information sufficient to form a belief as to the  
10 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
11 on that basis deny those allegations. As to allegations pertaining specifically to  
12 Defendants in this Paragraph 149, Defendants deny any such allegations.

13           150. This Paragraph of the Third Amended Complaint sets forth allegations  
14 against certain other defendants, as well as all defendants in this action collectively.  
15 Defendants are without knowledge or information sufficient to form a belief as to the  
16 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
17 on that basis deny those allegations. As to allegations pertaining specifically to  
18 Defendants in this Paragraph 150, Defendants deny any such allegations.

19           151. Ms. Dean denies the allegations in Paragraph 151. Songs of Universal  
20 denies that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*” mixtape are infringing,  
21 and lacks knowledge or information sufficient to form a belief as to the truth of the  
22 remaining allegations contained in Paragraph 151, and on that basis denies each and  
23 every remaining allegation contained therein.

24           152. Ms. Dean denies the allegations in Paragraph 152. Songs of Universal  
25 denies that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*” mixtape are infringing,  
26 and lacks knowledge or information sufficient to form a belief as to the truth of the  
27 remaining allegations contained in Paragraph 152, and on that basis denies each and  
28 every remaining allegation contained therein.



1           153. This Paragraph of the Third Amended Complaint sets forth allegations  
2 against certain other defendants, as well as all defendants in this action collectively.  
3 Defendants are without knowledge or information sufficient to form a belief as to the  
4 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
5 on that basis deny those allegations. As to allegations pertaining specifically to  
6 Defendants in this Paragraph 153, Defendants deny any such allegations.

7           154. This Paragraph of the Third Amended Complaint sets forth allegations  
8 against certain other defendants, as well as all defendants in this action collectively.  
9 Defendants are without knowledge or information sufficient to form a belief as to the  
10 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
11 on that basis deny those allegations. As to allegations pertaining specifically to  
12 Defendants in this Paragraph 154, Defendants deny any such allegations.

13           155. This Paragraph of the Third Amended Complaint sets forth allegations  
14 against certain other defendants, as well as all defendants in this action collectively.  
15 Defendants are without knowledge or information sufficient to form a belief as to the  
16 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
17 on that basis deny those allegations. As to allegations pertaining specifically to  
18 Defendants in this Paragraph 155, Defendants deny any such allegations.

19           156. Songs of Universal denies the allegations in Paragraph 156. Ms. Dean  
20 lacks knowledge or information sufficient to form a belief as to the truth of the  
21 allegations contained in Paragraph 156, and on that basis denies each and every  
22 allegation contained therein.

23           157. Defendants lack knowledge or information sufficient to form a belief as  
24 to the truth of the allegations contained in Paragraph 157, and on that basis deny each  
25 and every allegation contained therein.

26           158. This Paragraph of the Third Amended Complaint sets forth allegations  
27 against certain other defendants, as well as all defendants in this action collectively.  
28 Defendants are without knowledge or information sufficient to form a belief as to the

1 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
2 on that basis deny those allegations. As to allegations pertaining specifically to  
3 Defendants in this Paragraph 158, Defendants deny any such allegations.

4 159. This Paragraph of the Third Amended Complaint sets forth allegations  
5 against certain other defendants, as well as all defendants in this action collectively.  
6 Defendants are without knowledge or information sufficient to form a belief as to the  
7 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
8 on that basis deny those allegations. As to allegations pertaining specifically to  
9 Defendants in this Paragraph 159, Defendants deny any such allegations.

10 160. This Paragraph of the Third Amended Complaint sets forth allegations  
11 against certain other defendants, as well as all defendants in this action collectively.  
12 Defendants are without knowledge or information sufficient to form a belief as to the  
13 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
14 on that basis deny those allegations. As to allegations pertaining specifically to  
15 Defendants in this Paragraph 160, Defendants deny any such allegations.

16 161. This Paragraph of the Third Amended Complaint sets forth allegations  
17 against certain other defendants, as well as all defendants in this action collectively.  
18 Defendants are without knowledge or information sufficient to form a belief as to the  
19 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
20 on that basis deny those allegations. As to allegations pertaining specifically to  
21 Defendants in this Paragraph 161, Defendants deny any such allegations.

22 162. This Paragraph of the Third Amended Complaint sets forth allegations  
23 against certain other defendants, as well as all defendants in this action collectively.  
24 Defendants are without knowledge or information sufficient to form a belief as to the  
25 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
26 on that basis deny those allegations. As to allegations pertaining specifically to  
27 Defendants in this Paragraph 162, Defendants deny any such allegations.

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1           163. Ms. Dean denies the allegations in Paragraph 163. Songs of Universal  
2 lacks knowledge or information sufficient to form a belief as to the truth of the  
3 allegations contained in Paragraph 163, and on that basis denies each and every  
4 allegation contained therein.

5           164. Ms. Dean denies the allegations in Paragraph 164. Songs of Universal  
6 lacks knowledge or information sufficient to form a belief as to the truth of the  
7 allegations contained in Paragraph 164, and on that basis denies each and every  
8 allegation contained therein.

9           165. This Paragraph of the Third Amended Complaint sets forth allegations  
10 against certain other defendants, as well as all defendants in this action collectively.  
11 Defendants are without knowledge or information sufficient to form a belief as to the  
12 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
13 on that basis deny those allegations. As to allegations pertaining specifically to  
14 Defendants in this Paragraph 165, Defendants deny any such allegations.

15                           ***“Johnson’s Discovery of the Infringing Work”***

16           166. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 166, and on that basis deny each  
18 and every allegation contained therein.

19           167. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 167, and on that basis deny each  
21 and every allegation contained therein.

22           168. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 168, and on that basis deny each  
24 and every allegation contained therein.

25           169. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 169, and on that basis deny each  
27 and every allegation contained therein.

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1 170. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 170, and on that basis deny each  
3 and every allegation contained therein.

4 ***“Defendants’ Continuing Infringement,***  
5 ***Wrongful Acts, and Harm to Johnson”***

6 171. Paragraph 171 contains legal conclusions to which no response is  
7 required. To the extent any response is required, Defendants deny the allegations in  
8 Paragraph 171.

9 172. Paragraph 172 contains legal conclusions to which no response is  
10 required. To the extent any response is required, this Paragraph of the Third Amended  
11 Complaint sets forth allegations against all defendants in this action collectively.  
12 Defendants are without knowledge or information sufficient to form a belief as to the  
13 truth of the allegations of this Paragraph as to defendants other than Defendants on  
14 that basis and denies those allegations. As to allegations pertaining specifically to  
15 Defendants in this Paragraph 172, Defendants deny any such allegations.

16 173. Paragraph 173 contains legal conclusions to which no response is  
17 required. To the extent any response is required, this Paragraph of the Third Amended  
18 Complaint sets forth allegations against all defendants in this action collectively.  
19 Defendants are without knowledge or information sufficient to form a belief as to the  
20 truth of the allegations of this Paragraph as to defendants other than Defendants on  
21 that basis and denies those allegations. As to allegations pertaining specifically to  
22 Defendants in this Paragraph 173, Defendants deny any such allegations.

23 174. Paragraph 174 contains legal conclusions to which no response is  
24 required. To the extent any response is required, this Paragraph of the Third Amended  
25 Complaint sets forth allegations against all defendants in this action collectively.  
26 Defendants are without knowledge or information sufficient to form a belief as to the  
27 truth of the allegations of this Paragraph as to defendants other than Defendants on

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1 that basis and denies those allegations. As to allegations pertaining specifically to  
2 Defendants in this Paragraph 174, Defendants deny any such allegations.

3 175. Paragraph 175 contains legal conclusions to which no response is  
4 required. To the extent any response is required, this Paragraph of the Third Amended  
5 Complaint sets forth allegations against all defendants in this action collectively.  
6 Defendants are without knowledge or information sufficient to form a belief as to the  
7 truth of the allegations of this Paragraph as to defendants other than Defendants on  
8 that basis and denies those allegations. As to allegations pertaining specifically to  
9 Defendants in this Paragraph 175, Defendants deny any such allegations.

10 176. Paragraph 176 contains legal conclusions to which no response is  
11 required. To the extent any response is required, this Paragraph of the Third Amended  
12 Complaint sets forth allegations against all defendants in this action collectively.  
13 Defendants are without knowledge or information sufficient to form a belief as to the  
14 truth of the allegations of this Paragraph as to defendants other than Defendants on  
15 that basis and denies those allegations. As to allegations pertaining specifically to  
16 Defendants in this Paragraph 176, Defendants deny any such allegations.

### 17 **“Count I**

#### 18 **“Copyright Infringement (17 U.S.C. §§ 501 et seq.)”**

19 177. Defendants re-allege and incorporate herein by reference their responses  
20 to Paragraphs 1 through 176 above, inclusive, as though fully set forth herein.

21 178. Paragraph 178 contains legal conclusions to which no response is  
22 required. To the extent any response is required, Defendants are without knowledge  
23 or information sufficient to form a belief as to the truth of the allegations of this  
24 Paragraph, and on that basis and deny those allegations.

25 179. This Paragraph of the Third Amended Complaint sets forth allegations  
26 against certain other defendants, as well as all defendants in this action collectively.  
27 Defendants are without knowledge or information sufficient to form a belief as to the  
28 truth of the allegations of this Paragraph as to defendants other than Defendants, and

1 on that basis deny those allegations. As to allegations pertaining specifically to  
2 Defendants in this Paragraph 179, Defendants deny any such allegations.

3 180. Defendants lack knowledge or information sufficient to form a belief as  
4 to the truth of the allegations contained in Paragraph 180, and on that basis deny each  
5 and every allegation contained therein.

6 181. Defendants lack knowledge or information sufficient to form a belief as  
7 to the truth of the allegations contained in Paragraph 181, and on that basis deny each  
8 and every allegation contained therein.

9 182. Defendants lack knowledge or information sufficient to form a belief as  
10 to the truth of the allegations contained in Paragraph 182, and on that basis deny each  
11 and every allegation contained therein.

12 183. This Paragraph of the Third Amended Complaint sets forth allegations  
13 against certain other defendants, as well as all defendants in this action. Defendants  
14 are without knowledge or information sufficient to form a belief as to the truth of the  
15 allegations of this Paragraph as to defendants other than Defendants, and on that basis  
16 deny those allegations. As to allegations pertaining specifically to Songs of Universal  
17 in this Paragraph 183, Songs of Universal denies the allegations contained therein.  
18 Ms. Dean lacks knowledge or information sufficient to form a belief as to the truth of  
19 any allegations pertaining to her in this Paragraph 183, and on that basis denies each  
20 and every allegation contained therein.

21 184. Defendants lack knowledge or information sufficient to form a belief as  
22 to the truth of the allegations contained in Paragraph 184, and on that basis deny each  
23 and every allegation contained therein.

24 185. Defendants lack knowledge or information sufficient to form a belief as  
25 to the truth of the allegations contained in Paragraph 185, and on that basis deny each  
26 and every allegation contained therein.

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1           186. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 186, and on that basis deny each  
3 and every allegation contained therein.

4           187. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 187, and on that basis deny each  
6 and every allegation contained therein.

7           188. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 188, and on that basis deny each  
9 and every allegation contained therein.

10           189. Songs of Universal denies the allegations in Paragraph 189. Ms. Dean  
11 lacks knowledge or information sufficient to form a belief as to the truth of the  
12 allegations contained in Paragraph 189, and on that basis denies each and every  
13 allegation contained therein.

14           190. Defendants lack knowledge or information sufficient to form a belief as  
15 to the truth of the allegations contained in Paragraph 190, and on that basis deny each  
16 and every allegation contained therein.

17           191. Defendants lack knowledge or information sufficient to form a belief as  
18 to the truth of the allegations contained in Paragraph 191, and on that basis deny each  
19 and every allegation contained therein.

20           192. Defendants lack knowledge or information sufficient to form a belief as  
21 to the truth of the allegations contained in Paragraph 192, and on that basis deny each  
22 and every allegation contained therein.

23           193. Defendants lack knowledge or information sufficient to form a belief as  
24 to the truth of the allegations contained in Paragraph 193, and on that basis deny each  
25 and every allegation contained therein.

26           194. Defendants lack knowledge or information sufficient to form a belief as  
27 to the truth of the allegations contained in Paragraph 194, and on that basis deny each  
28 and every allegation contained therein.



1           195. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 195, and on that basis deny each  
3 and every allegation contained therein.

4           196. This Paragraph of the Third Amended Complaint sets forth allegations  
5 against certain other defendants, as well as all defendants in this action. Defendants  
6 are without knowledge or information sufficient to form a belief as to the truth of the  
7 allegations of this Paragraph as to defendants other than Defendants, and on that basis  
8 deny those allegations. As to allegations pertaining specifically to Songs of Universal  
9 in this Paragraph 196, Songs of Universal denies the allegations contained therein.  
10 Ms. Dean lacks knowledge or information sufficient to form a belief as to the truth of  
11 any allegations pertaining to her in this Paragraph 196, and on that basis denies each  
12 and every allegation contained therein.

13           197. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 197, and on that basis deny each  
15 and every allegation contained therein.

16           198. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 198, and on that basis deny each  
18 and every allegation contained therein.

19           199. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 199, and on that basis deny each  
21 and every allegation contained therein.

22           200. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 200, and on that basis deny each  
24 and every allegation contained therein.

25           201. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 201, and on that basis deny each  
27 and every allegation contained therein.

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1           202. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 202, and on that basis deny each  
3 and every allegation contained therein.

4           203. Defendants deny that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*”  
5 mixtape, and each of them, are infringing, lack knowledge or information sufficient  
6 to form a belief as to the truth of the remaining allegations contained in Paragraph  
7 203, and on that basis deny each and every remaining allegation contained therein.

8           204. Defendants lack knowledge or information sufficient to form a belief as  
9 to the truth of the allegations contained in Paragraph 204, and on that basis deny each  
10 and every allegation contained therein.

11           205. Defendants lack knowledge or information sufficient to form a belief as  
12 to the truth of the allegations contained in Paragraph 205, and on that basis deny each  
13 and every allegation contained therein.

14           206. Defendants lack knowledge or information sufficient to form a belief as  
15 to the truth of the allegations contained in Paragraph 206, and on that basis deny each  
16 and every allegation contained therein.

17           207. Defendants lack knowledge or information sufficient to form a belief as  
18 to the truth of the allegations contained in Paragraph 207, and on that basis deny each  
19 and every allegation contained therein.

20           208. Defendants lack knowledge or information sufficient to form a belief as  
21 to the truth of the allegations contained in Paragraph 208, and on that basis deny each  
22 and every allegation contained therein.

23           209. Defendants lack knowledge or information sufficient to form a belief as  
24 to the truth of the allegations contained in Paragraph 209, and on that basis deny each  
25 and every allegation contained therein.

26           210. Defendants lack knowledge or information sufficient to form a belief as  
27 to the truth of the allegations contained in Paragraph 210, and on that basis deny each  
28 and every allegation contained therein.

1           211. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 211, and on that basis deny each  
3 and every allegation contained therein.

4           212. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 212, and on that basis deny each  
6 and every allegation contained therein.

7           213. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 213, and on that basis deny each  
9 and every allegation contained therein.

10          214. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 214, and on that basis deny each  
12 and every allegation contained therein.

13          215. Defendants deny that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*”  
14 mixtape, and each of them, are infringing, lack knowledge or information sufficient  
15 to form a belief as to the truth of the remaining allegations contained in Paragraph  
16 215, and on that basis deny each and every remaining allegation contained therein.

17          216. Defendants lack knowledge or information sufficient to form a belief as  
18 to the truth of the allegations contained in Paragraph 216, and on that basis deny each  
19 and every allegation contained therein.

20          217. Defendants lack knowledge or information sufficient to form a belief as  
21 to the truth of the allegations contained in Paragraph 217, and on that basis deny each  
22 and every allegation contained therein.

23          218. Defendants deny that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*”  
24 mixtape, and each of them, are infringing, lack knowledge or information sufficient  
25 to form a belief as to the truth of the remaining allegations contained in Paragraph  
26 218, and on that basis deny each and every remaining allegation contained therein.

27          219. Defendants deny that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*”  
28 mixtape, and each of them, are infringing, lack knowledge or information sufficient

1 to form a belief as to the truth of the remaining allegations contained in Paragraph  
2 219, and on that basis deny each and every remaining allegation contained therein.

3 220. Defendants lack knowledge or information sufficient to form a belief as  
4 to the truth of the allegations contained in Paragraph 220, and on that basis deny each  
5 and every allegation contained therein.

6 221. Songs of Universal denies the allegations in Paragraph 221. Ms. Dean  
7 denies that "*I Lied*," "*The Pinkprint*" album, and the "*Ransom*" mixtape, and each of  
8 them, are infringing, lacks knowledge or information sufficient to form a belief as to  
9 the truth of the remaining allegations contained in Paragraph 221, and on that basis  
10 denies each and every remaining allegation contained therein.

11 222. Songs of Universal denies the allegations in Paragraph 222. Ms. Dean  
12 denies that "*I Lied*," "*The Pinkprint*" album, and the "*Ransom*" mixtape, and each of  
13 them, are infringing, lacks knowledge or information sufficient to form a belief as to  
14 the truth of the remaining allegations contained in Paragraph 222, and on that basis  
15 denies each and every remaining allegation contained therein.

16 223. Songs of Universal denies the allegations in Paragraph 223, including but  
17 not limited to because it denies that any permission from Plaintiff was required. Ms.  
18 Dean denies that "*I Lied*," "*The Pinkprint*" album, and the "*Ransom*" mixtape, and  
19 each of them, are infringing, lacks knowledge or information sufficient to form a belief  
20 as to the truth of the remaining allegations contained in Paragraph 223, and on that  
21 basis denies each and every remaining allegation contained therein.

22 224. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 224, and on that basis deny each  
24 and every allegation contained therein.

25 225. Defendants deny that "*I Lied*," "*The Pinkprint*" album, and the "*Ransom*"  
26 mixtape, and each of them, are infringing, lack knowledge or information sufficient  
27 to form a belief as to the truth of the remaining allegations contained in Paragraph  
28 225, and on that basis deny each and every remaining allegation contained therein.

1           226. Defendants deny that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*”  
2 mixtape, and each of them, are infringing, lack knowledge or information sufficient  
3 to form a belief as to the truth of the remaining allegations contained in Paragraph  
4 226, and on that basis deny each and every remaining allegation contained therein.

5           227. Defendants deny that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*”  
6 mixtape, and each of them, are infringing, lack knowledge or information sufficient  
7 to form a belief as to the truth of the remaining allegations contained in Paragraph  
8 227, and on that basis deny each and every remaining allegation contained therein.

9           228. Defendants deny that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*”  
10 mixtape, and each of them, are infringing, lack knowledge or information sufficient  
11 to form a belief as to the truth of the remaining allegations contained in Paragraph  
12 228, and on that basis deny each and every remaining allegation contained therein.

13           229. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 229, and on that basis deny each  
15 and every allegation contained therein.

16           230. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 230, and on that basis deny each  
18 and every allegation contained therein.

19           231. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 231, and on that basis deny each  
21 and every allegation contained therein.

22           232. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 232, and on that basis deny each  
24 and every allegation contained therein.

25           233. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 233, and on that basis deny each  
27 and every allegation contained therein.

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1           234. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 234, and on that basis deny each  
3 and every allegation contained therein.

4           235. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 235, and on that basis deny each  
6 and every allegation contained therein.

7           236. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 236, and on that basis deny each  
9 and every allegation contained therein.

10          237. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 237, and on that basis deny each  
12 and every allegation contained therein.

13          238. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 238, and on that basis deny each  
15 and every allegation contained therein.

16          239. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 239, and on that basis deny each  
18 and every allegation contained therein.

19          240. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 240, and on that basis deny each  
21 and every allegation contained therein.

22          241. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 241, and on that basis deny each  
24 and every allegation contained therein.

25          242. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 242, and on that basis deny each  
27 and every allegation contained therein.

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1           243. Ms. Dean denies the allegations in Paragraph 243. Songs of Universal  
2 denies that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*” mixtape, and each of  
3 them, are infringing, lacks knowledge or information sufficient to form a belief as to  
4 the truth of the remaining allegations contained in Paragraph 243, and on that basis  
5 denies each and every remaining allegation contained therein.

6           244. Ms. Dean denies the allegations in Paragraph 244. Songs of Universal  
7 denies that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*” mixtape, and each of  
8 them, are infringing, lacks knowledge or information sufficient to form a belief as to  
9 the truth of the remaining allegations contained in Paragraph 244, and on that basis  
10 denies each and every remaining allegation contained therein.

11           245. Ms. Dean denies the allegations in Paragraph 245, including but not  
12 limited to because it denies that any permission from Plaintiff was required. Songs of  
13 Universal denies that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*” mixtape,  
14 and each of them, are infringing, lacks knowledge or information sufficient to form a  
15 belief as to the truth of the remaining allegations contained in Paragraph 245, and on  
16 that basis denies each and every remaining allegation contained therein.

17           246. Ms. Dean denies the allegations in Paragraph 246, including but not  
18 limited to because it denies that any permission from Plaintiff was required. Songs of  
19 Universal denies that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*” mixtape,  
20 and each of them, are infringing, lacks knowledge or information sufficient to form a  
21 belief as to the truth of the remaining allegations contained in Paragraph 246, and on  
22 that basis denies each and every remaining allegation contained therein.

23           247. Ms. Dean denies the allegations in Paragraph 247, including but not  
24 limited to because it denies that any permission from Plaintiff was required. Songs of  
25 Universal denies that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*” mixtape,  
26 and each of them, are infringing, lacks knowledge or information sufficient to form a  
27 belief as to the truth of the remaining allegations contained in Paragraph 247, and on  
28 that basis denies each and every remaining allegation contained therein.



1           248. Ms. Dean denies the allegations in Paragraph 248, including but not  
2 limited to because it denies that any permission from Plaintiff was required. Songs of  
3 Universal denies that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*” mixtape,  
4 and each of them, are infringing, lacks knowledge or information sufficient to form a  
5 belief as to the truth of the remaining allegations contained in Paragraph 248, and on  
6 that basis denies each and every remaining allegation contained therein.

7           249. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 249, and on that basis deny each  
9 and every allegation contained therein.

10          250. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 250, and on that basis deny each  
12 and every allegation contained therein.

13          251. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 251, and on that basis deny each  
15 and every allegation contained therein.

16          252. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 252, and on that basis deny each  
18 and every allegation contained therein.

19          253. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 253, and on that basis deny each  
21 and every allegation contained therein.

22          254. Songs of Universal denies the allegations in Paragraph 254. Ms. Dean  
23 denies that “*I Lied*” is an “infringing work,” lacks knowledge or information sufficient  
24 to form a belief as to the truth of the remaining allegations contained in Paragraph  
25 254, and on that basis denies each and every remaining allegation contained therein.

26          255. Defendants deny that “*I Lied*” is an “infringing work,” lack knowledge  
27 or information sufficient to form a belief as to the truth of the remaining allegations

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1 contained in Paragraph 255, and on that basis deny each and every remaining  
2 allegation contained therein.

3 256. Defendants lack knowledge or information sufficient to form a belief as  
4 to the truth of the allegations contained in Paragraph 256, and on that basis deny each  
5 and every allegation contained therein.

6 257. Defendants lack knowledge or information sufficient to form a belief as  
7 to the truth of the allegations contained in Paragraph 257, and on that basis deny each  
8 and every allegation contained therein.

9 258. Defendants lack knowledge or information sufficient to form a belief as  
10 to the truth of the allegations contained in Paragraph 258, and on that basis deny each  
11 and every allegation contained therein.

12 259. Defendants lack knowledge or information sufficient to form a belief as  
13 to the truth of the allegations contained in Paragraph 259, and on that basis deny each  
14 and every allegation contained therein.

15 260. Defendants lack knowledge or information sufficient to form a belief as  
16 to the truth of the allegations contained in Paragraph 260, and on that basis deny each  
17 and every allegation contained therein.

18 261. Ms. Dean denies the allegations in Paragraph 261. Songs of Universal  
19 denies that "*I Lied*" is an "infringing work," lacks knowledge or information sufficient  
20 to form a belief as to the truth of the remaining allegations contained in Paragraph  
21 261, and on that basis denies each and every remaining allegation contained therein.

22 262. Ms. Dean denies the allegations in Paragraph 262. Songs of Universal  
23 denies that "*I Lied*" is an "infringing work," lacks knowledge or information sufficient  
24 to form a belief as to the truth of the remaining allegations contained in Paragraph  
25 262, and on that basis denies each and every remaining allegation contained therein.

26 263. Defendants lack knowledge or information sufficient to form a belief as  
27 to the truth of the allegations contained in Paragraph 263, and on that basis deny each  
28 and every allegation contained therein.

1           264. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 264, and on that basis deny each  
3 and every allegation contained therein.

4           265. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 265, and on that basis deny each  
6 and every allegation contained therein.

7           266. Songs of Universal denies the allegations in Paragraph 266. Ms. Dean  
8 denies that “*I Lied*” is an “infringing work,” lacks knowledge or information sufficient  
9 to form a belief as to the truth of the remaining allegations contained in Paragraph  
10 266, and on that basis denies each and every remaining allegation contained therein.

11           267. Defendants deny that “*I Lied*” is an “infringing work,” lack knowledge  
12 or information sufficient to form a belief as to the truth of the remaining allegations  
13 contained in Paragraph 267, and on that basis deny each and every remaining  
14 allegation contained therein.

15           268. Defendants lack knowledge or information sufficient to form a belief as  
16 to the truth of the allegations contained in Paragraph 268, and on that basis deny each  
17 and every allegation contained therein.

18           269. Defendants lack knowledge or information sufficient to form a belief as  
19 to the truth of the allegations contained in Paragraph 269, and on that basis deny each  
20 and every allegation contained therein.

21           270. Defendants lack knowledge or information sufficient to form a belief as  
22 to the truth of the allegations contained in Paragraph 270, and on that basis deny each  
23 and every allegation contained therein.

24           271. Defendants lack knowledge or information sufficient to form a belief as  
25 to the truth of the allegations contained in Paragraph 271, and on that basis deny each  
26 and every allegation contained therein.

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1           272. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 272, and on that basis denies  
3 each and every allegation contained therein.

4           273. Ms. Dean denies the allegations in Paragraph 273. Songs of Universal  
5 denies that “*I Lied*” is an “infringing work,” lacks knowledge or information sufficient  
6 to form a belief as to the truth of the remaining allegations contained in Paragraph  
7 273, and on that basis denies each and every remaining allegation contained therein.

8           274. Ms. Dean denies the allegations in Paragraph 274. Songs of Universal  
9 denies that “*I Lied*” is an “infringing work,” lacks knowledge or information sufficient  
10 to form a belief as to the truth of the remaining allegations contained in Paragraph  
11 274, and on that basis denies each and every remaining allegation contained therein.

12           275. Defendants lack knowledge or information sufficient to form a belief as  
13 to the truth of the allegations contained in Paragraph 275, and on that basis deny each  
14 and every allegation contained therein.

15           276. Defendants lack knowledge or information sufficient to form a belief as  
16 to the truth of the allegations contained in Paragraph 276, and on that basis deny each  
17 and every allegation contained therein.

18           277. Defendants lack knowledge or information sufficient to form a belief as  
19 to the truth of the allegations contained in Paragraph 277, and on that basis deny each  
20 and every allegation contained therein.

21           278. Songs of Universal admits that it was involved, directly or indirectly, in  
22 licensing a portion of the composition “*I Lied*,” and denies the remaining allegations  
23 in Paragraph 278. Ms. Dean denies that “*I Lied*,” “*The Pinkprint*” album, and the  
24 “*Ransom*” mixtape are infringing,” lacks knowledge or information sufficient to form  
25 a belief as to the truth of the remaining allegations contained in Paragraph 278, and  
26 on that basis denies each and every remaining allegation contained therein.

27           279. Defendants deny that “*I Lied*,” “*The Pinkprint*” album, and the “*Ransom*”  
28 mixtape are infringing,” lack knowledge or information sufficient to form a belief as

1 to the truth of the remaining allegations contained in Paragraph 279, and on that basis  
2 deny each and every remaining allegation contained therein.

3 280. Defendants lack knowledge or information sufficient to form a belief as  
4 to the truth of the allegations contained in Paragraph 280, and on that basis deny each  
5 and every allegation contained therein.

6 281. Defendants lack knowledge or information sufficient to form a belief as  
7 to the truth of the allegations contained in Paragraph 281, and on that basis deny each  
8 and every allegation contained therein.

9 282. Defendants lack knowledge or information sufficient to form a belief as  
10 to the truth of the allegations contained in Paragraph 282, and on that basis deny each  
11 and every allegation contained therein.

12 283. Defendants lack knowledge or information sufficient to form a belief as  
13 to the truth of the allegations contained in Paragraph 283, and on that basis deny each  
14 and every allegation contained therein.

15 284. Defendants lack knowledge or information sufficient to form a belief as  
16 to the truth of the allegations contained in Paragraph 284, and on that basis deny each  
17 and every allegation contained therein.

18 285. Ms. Dean admits that she was involved, directly or indirectly, in licensing  
19 a portion of the composition "*I Lied*," and denies the remaining allegations in  
20 Paragraph 285. Songs of Universal denies that "*I Lied*," "*The Pinkprint*" album, and  
21 the "*Ransom*" mixtape are infringing," lacks knowledge or information sufficient to  
22 form a belief as to the truth of the remaining allegations contained in Paragraph 285,  
23 and on that basis denies each and every remaining allegation contained therein.

24 286. Ms. Dean admits that she was involved, directly or indirectly, in licensing  
25 a portion of the composition "*I Lied*," and denies the remaining allegations in  
26 Paragraph 286. Songs of Universal denies that "*I Lied*," "*The Pinkprint*" album, and  
27 the "*Ransom*" mixtape are infringing," lacks knowledge or information sufficient to

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1 form a belief as to the truth of the remaining allegations contained in Paragraph 286,  
2 and on that basis denies each and every remaining allegation contained therein.

3 287. Defendants lack knowledge or information sufficient to form a belief as  
4 to the truth of the allegations contained in Paragraph 287, and on that basis deny each  
5 and every allegation contained therein.

6 288. This Paragraph of the Third Amended Complaint sets forth allegations  
7 against certain other defendants, as well as all defendants in this action collectively.  
8 Defendants are without knowledge or information sufficient to form a belief as to the  
9 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
10 on that basis deny those allegations. As to allegations pertaining specifically to  
11 Defendants in this Paragraph 288, Defendants deny any such allegations.

12 289. Defendants lack knowledge or information sufficient to form a belief as  
13 to the truth of the allegations contained in Paragraph 289, and on that basis deny each  
14 and every allegation contained therein.

15 290. Defendants lack knowledge or information sufficient to form a belief as  
16 to the truth of the allegations contained in Paragraph 290, and on that basis deny each  
17 and every allegation contained therein.

18 291. Songs of Universal denies the allegations contained in Paragraph 291.  
19 Ms. Dean denies that "*I Lied*" is an "infringing work," lacks knowledge or information  
20 sufficient to form a belief as to the truth of the remaining allegations contained in  
21 Paragraph 291, and on that basis denies each and every remaining allegation contained  
22 therein.

23 292. Defendants deny that "*I Lied*" is an "infringing work," lack knowledge  
24 or information sufficient to form a belief as to the truth of the remaining allegations  
25 contained in Paragraph 292, and on that basis deny each and every remaining  
26 allegation contained therein.

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1           293. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 293, and on that basis deny each  
3 and every allegation contained therein.

4           294. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 294, and on that basis deny each  
6 and every allegation contained therein.

7           295. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 295, and on that basis deny each  
9 and every allegation contained therein.

10          296. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 296, and on that basis deny each  
12 and every allegation contained therein.

13          297. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 297, and on that basis deny each  
15 and every allegation contained therein.

16          298. Ms. Dean denies the allegations contained in Paragraph 298. Songs of  
17 Universal denies that “*I Lied*” is an “infringing work,” lacks knowledge or information  
18 sufficient to form a belief as to the truth of the remaining allegations contained in  
19 Paragraph 298, and on that basis denies each and every remaining allegation contained  
20 therein.

21          299. Ms. Dean denies the allegations contained in Paragraph 299. Songs of  
22 Universal denies that “*I Lied*” is an “infringing work,” lacks knowledge or information  
23 sufficient to form a belief as to the truth of the remaining allegations contained in  
24 Paragraph 299, and on that basis denies each and every remaining allegation contained  
25 therein.

26          300. Defendants lack knowledge or information sufficient to form a belief as  
27 to the truth of the allegations contained in Paragraph 300, and on that basis deny each  
28 and every allegation contained therein.



1           301. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 301, and on that basis deny each  
3 and every allegation contained therein.

4           302. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 302, and on that basis deny each  
6 and every allegation contained therein.

7           303. Paragraph 303 contains legal conclusions to which no response is  
8 required. To the extent any response is required, Songs of Universal denies the  
9 allegations contained in Paragraph 303, including the allegation that “*I Lied*” is an  
10 “infringing work.” Ms. Dean denies that “*I Lied*” is an “infringing work,” lacks  
11 knowledge or information sufficient to form a belief as to the truth of the remaining  
12 allegations contained in Paragraph 303, and on that basis denies each and every  
13 remaining allegation contained therein.

14           304. Paragraph 304 contains legal conclusions to which no response is  
15 required. To the extent any response is required, Defendants deny that “*I Lied*” is an  
16 “infringing work,” lack knowledge or information sufficient to form a belief as to the  
17 truth of the remaining allegations contained in Paragraph 304, and on that basis deny  
18 each and every remaining allegation contained therein.

19           305. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 305, and on that basis deny each  
21 and every allegation contained therein.

22           306. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 306, and on that basis deny each  
24 and every allegation contained therein.

25           307. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 307, and on that basis deny each  
27 and every allegation contained therein.

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1           308. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 308, and on that basis deny each  
3 and every allegation contained therein.

4           309. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 309, and on that basis deny each  
6 and every allegation contained therein.

7           310. Paragraph 310 contains legal conclusions to which no response is  
8 required. To the extent any response is required, Ms. Dean denies the allegations  
9 contained in Paragraph 310, including the allegation that “*I Lied*” is an “infringing  
10 work.” Songs of Universal denies that “*I Lied*” is an “infringing work,” lacks  
11 knowledge or information sufficient to form a belief as to the truth of the remaining  
12 allegations contained in Paragraph 310, and on that basis denies each and every  
13 remaining allegation contained therein.

14           311. Paragraph 311 contains legal conclusions to which no response is  
15 required. To the extent any response is required, Ms. Dean denies the allegations  
16 contained in Paragraph 311, including the allegation that “*I Lied*” is an “infringing  
17 work.” Songs of Universal denies that “*I Lied*” is an “infringing work,” lacks  
18 knowledge or information sufficient to form a belief as to the truth of the remaining  
19 allegations contained in Paragraph 311, and on that basis denies each and every  
20 remaining allegation contained therein.

21           312. Defendants lack knowledge or information sufficient to form a belief as  
22 to the truth of the allegations contained in Paragraph 312, and on that basis deny each  
23 and every allegation contained therein.

24           313. This Paragraph of the Third Amended Complaint sets forth allegations  
25 against certain other defendants, as well as all defendants in this action collectively.  
26 Defendants are without knowledge or information sufficient to form a belief as to the  
27 truth of the allegations of this Paragraph as to defendants other than Defendants, and

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1 on that basis deny those allegations. As to allegations pertaining specifically to  
2 Defendants in this Paragraph 313, Defendants deny such allegations.

3 314. This Paragraph of the Third Amended Complaint sets forth allegations  
4 against certain other defendants, as well as all defendants in this action collectively.  
5 Defendants are without knowledge or information sufficient to form a belief as to the  
6 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
7 on that basis deny those allegations. As to allegations pertaining specifically to  
8 Defendants in this Paragraph 314, Defendants deny each and every allegation  
9 contained therein.

10 315. This Paragraph of the Third Amended Complaint sets forth allegations  
11 against certain other defendants, as well as all defendants in this action collectively.  
12 Defendants are without knowledge or information sufficient to form a belief as to the  
13 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
14 on that basis deny those allegations. As to allegations pertaining specifically to  
15 Defendants in this Paragraph 315, Defendants deny each and every allegation  
16 contained therein.

17 316. This Paragraph of the Third Amended Complaint sets forth allegations  
18 against certain other defendants, as well as all defendants in this action collectively.  
19 Defendants are without knowledge or information sufficient to form a belief as to the  
20 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
21 on that basis deny those allegations. As to allegations pertaining specifically to  
22 Defendants in this Paragraph 316, Defendants deny each and every allegation  
23 contained therein.

24 317. Paragraph 317 contains legal conclusions to which no response is  
25 required. To the extent any response is required, this Paragraph of the Third Amended  
26 Complaint sets forth allegations against all defendants in this action collectively.  
27 Defendants are without knowledge or information sufficient to form a belief as to the  
28 truth of the allegations of this Paragraph as to defendants other than Defendants, and

1 on that basis and denies those allegations. As to allegations pertaining specifically to  
2 Defendants in this Paragraph 317, Defendants deny any such allegations.

3 318. This Paragraph of the Third Amended Complaint sets forth allegations  
4 against certain other defendants, as well as all defendants in this action collectively.  
5 Defendants are without knowledge or information sufficient to form a belief as to the  
6 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
7 on that basis deny those allegations. As to allegations pertaining specifically to  
8 Defendants in this Paragraph 318, Defendants deny each and every allegation  
9 contained therein.

10 319. This Paragraph of the Third Amended Complaint sets forth allegations  
11 against certain other defendants, as well as all defendants in this action collectively.  
12 Defendants are without knowledge or information sufficient to form a belief as to the  
13 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
14 on that basis deny those allegations. As to allegations pertaining specifically to  
15 Defendants in this Paragraph 319, Defendants deny each and every allegation  
16 contained therein.

17 **“Count II**

18 **“Vicarious Copyright Infringement”**

19 320. Defendants re-allege and incorporate herein by reference their responses  
20 to Paragraphs 1 through 319 above, inclusive, as though fully set forth herein.

21 321. Defendants lack knowledge or information sufficient to form a belief as  
22 to the truth of the allegations contained in Paragraph 321, and on that basis deny each  
23 and every allegation contained therein.

24 322. Defendants lack knowledge or information sufficient to form a belief as  
25 to the truth of the allegations contained in Paragraph 322, and on that basis deny each  
26 and every allegation contained therein.

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1           323. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 323, and on that basis deny each  
3 and every allegation contained therein.

4           324. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 324, and on that basis deny each  
6 and every allegation contained therein.

7           325. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 325, and on that basis deny each  
9 and every allegation contained therein.

10          326. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 326, and on that basis deny each  
12 and every allegation contained therein.

13          327. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 327, and on that basis deny each  
15 and every allegation contained therein.

16          328. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 328, and on that basis deny each  
18 and every allegation contained therein.

19          329. Paragraph 329 contains legal conclusions to which no response is  
20 required. To the extent any response is required, Songs of Universal denies the  
21 allegations in Paragraph 329. Ms. Dean lacks knowledge or information sufficient to  
22 form a belief as to the truth of the allegations contained in Paragraph 329, and on that  
23 basis denies each and every allegation contained therein.

24          330. Paragraph 330 contains legal conclusions to which no response is  
25 required. To the extent any response is required, Songs of Universal denies the  
26 allegations in Paragraph 330. Ms. Dean lacks knowledge or information sufficient to  
27 form a belief as to the truth of the allegations contained in Paragraph 330, and on that  
28 basis denies each and every allegation contained therein.

1           331. Paragraph 331 contains legal conclusions to which no response is  
2 required. To the extent any response is required, Songs of Universal denies the  
3 allegations in Paragraph 331. Ms. Dean lacks knowledge or information sufficient to  
4 form a belief as to the truth of the allegations contained in Paragraph 331, and on that  
5 basis denies each and every allegation contained therein.

6           332. Paragraph 332 contains legal conclusions to which no response is  
7 required. To the extent any response is required, Songs of Universal denies the  
8 allegations in Paragraph 332. Ms. Dean lacks knowledge or information sufficient to  
9 form a belief as to the truth of the allegations contained in Paragraph 332, and on that  
10 basis denies each and every allegation contained therein.

11           333. Paragraph 333 contains legal conclusions to which no response is  
12 required. To the extent any response is required, Defendants lack knowledge or  
13 information sufficient to form a belief as to the truth of the allegations contained in  
14 Paragraph 333, and on that basis deny each and every allegation contained therein.

15           334. Defendants lack knowledge or information sufficient to form a belief as  
16 to the truth of the allegations contained in Paragraph 334, and on that basis deny each  
17 and every allegation contained therein.

18           335. Paragraph 335 contains legal conclusions to which no response is  
19 required. To the extent any response is required, Defendants lack knowledge or  
20 information sufficient to form a belief as to the truth of the allegations contained in  
21 Paragraph 335, and on that basis deny each and every allegation contained therein.

22           336. Paragraph 336 contains legal conclusions to which no response is  
23 required. To the extent any response is required, Defendants lack knowledge or  
24 information sufficient to form a belief as to the truth of the allegations contained in  
25 Paragraph 336, and on that basis deny each and every allegation contained therein.

26           337. Defendants lack knowledge or information sufficient to form a belief as  
27 to the truth of the allegations contained in Paragraph 337, and on that basis deny each  
28 and every allegation contained therein.

1           338. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 338, and on that basis deny each  
3 and every allegation contained therein.

4           339. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 339, and on that basis deny each  
6 and every allegation contained therein.

7           340. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 340, and on that basis deny each  
9 and every allegation contained therein.

10          341. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 341, and on that basis deny each  
12 and every allegation contained therein.

13          342. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 342, and on that basis deny each  
15 and every allegation contained therein.

16          343. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 343, and on that basis deny each  
18 and every allegation contained therein.

19          344. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 344, and on that basis deny each  
21 and every allegation contained therein.

22          345. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 345, and on that basis deny each  
24 and every allegation contained therein.

25          346. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 346, and on that basis deny each  
27 and every allegation contained therein.

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1           347. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 347, and on that basis deny each  
3 and every allegation contained therein.

4           348. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 348, and on that basis deny each  
6 and every allegation contained therein.

7           349. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 349, and on that basis deny each  
9 and every allegation contained therein.

10          350. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 350, and on that basis deny each  
12 and every allegation contained therein.

13          351. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 351, and on that basis deny each  
15 and every allegation contained therein.

16          352. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 352 and on that basis deny each  
18 and every allegation contained therein.

19          353. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 353, and on that basis deny each  
21 and every allegation contained therein.

22          354. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 354, and on that basis deny each  
24 and every allegation contained therein.

25          355. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 355, and on that basis deny each  
27 and every allegation contained therein.

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1           356. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 356, and on that basis deny each  
3 and every allegation contained therein.

4           357. Paragraph 357 contains legal conclusions to which no response is  
5 required. To the extent any response is required, Ms. Dean denies the allegations in  
6 Paragraph 357. Songs of Universal lacks knowledge or information sufficient to form  
7 a belief as to the truth of the allegations contained in Paragraph 357, and on that basis  
8 denies each and every allegation contained therein.

9           358. Paragraph 358 contains legal conclusions to which no response is  
10 required. To the extent any response is required, Ms. Dean denies the allegations in  
11 Paragraph 358. Songs of Universal lacks knowledge or information sufficient to form  
12 a belief as to the truth of the allegations contained in Paragraph 358, and on that basis  
13 denies each and every allegation contained therein.

14           359. Paragraph 359 contains legal conclusions to which no response is  
15 required. To the extent any response is required, Ms. Dean denies the allegations in  
16 Paragraph 359. Songs of Universal lacks knowledge or information sufficient to form  
17 a belief as to the truth of the allegations contained in Paragraph 359, and on that basis  
18 denies each and every allegation contained therein.

19           360. Paragraph 360 contains legal conclusions to which no response is  
20 required. To the extent any response is required, Ms. Dean denies the allegations in  
21 Paragraph 360. Songs of Universal lacks knowledge or information sufficient to form  
22 a belief as to the truth of the allegations contained in Paragraph 360, and on that basis  
23 denies each and every allegation contained therein.

24           361. Paragraph 361 contains legal conclusions to which no response is  
25 required. To the extent any response is required, Ms. Dean denies the allegations in  
26 Paragraph 361. Songs of Universal lacks knowledge or information sufficient to form  
27 a belief as to the truth of the allegations contained in Paragraph 361, and on that basis  
28 denies each and every allegation contained therein.

1           362. Paragraph 362 contains legal conclusions to which no response is  
2 required. To the extent any response is required, Ms. Dean denies the allegations in  
3 Paragraph 362. Songs of Universal lacks knowledge or information sufficient to form  
4 a belief as to the truth of the allegations contained in Paragraph 362, and on that basis  
5 denies each and every allegation contained therein.

6           363. Paragraph 363 contains legal conclusions to which no response is  
7 required. To the extent any response is required, Ms. Dean denies the allegations in  
8 Paragraph 363. Songs of Universal lacks knowledge or information sufficient to form  
9 a belief as to the truth of the allegations contained in Paragraph 363, and on that basis  
10 denies each and every allegation contained therein.

11           364. Paragraph 364 contains legal conclusions to which no response is  
12 required. To the extent any response is required, Ms. Dean denies the allegations in  
13 Paragraph 364. Songs of Universal lacks knowledge or information sufficient to form  
14 a belief as to the truth of the allegations contained in Paragraph 364, and on that basis  
15 denies each and every allegation contained therein.

16           365. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 365, and on that basis deny each  
18 and every allegation contained therein.

19           366. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 366, and on that basis deny each  
21 and every allegation contained therein.

22           367. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 367, and on that basis deny each  
24 and every allegation contained therein.

25           368. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 368, and on that basis deny each  
27 and every allegation contained therein.

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1           369. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 369, and on that basis deny each  
3 and every allegation contained therein.

4           370. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 370, and on that basis deny each  
6 and every allegation contained therein.

7           371. This Paragraph of the Third Amended Complaint is vague, ambiguous,  
8 and/or indecipherable, such that Defendants lack knowledge or information sufficient  
9 to form a belief as to the truth of the allegations contained in Paragraph 371 and on  
10 that basis deny each and every allegation contained therein. To the extent Defendants  
11 are able to understand this Paragraph, it contains legal conclusions to which no  
12 response is required. To the extent any response is required, Defendants lack  
13 knowledge or information sufficient to form a belief as to the truth of the allegations  
14 contained in Paragraph 371, and on that basis deny each and every allegation  
15 contained therein.

16           372. This Paragraph of the Third Amended Complaint is vague, ambiguous,  
17 and/or indecipherable, such that Defendants lack knowledge or information sufficient  
18 to form a belief as to the truth of the allegations contained in Paragraph 372 and on  
19 that basis deny each and every allegation contained therein. To the extent Defendants  
20 are able to understand this Paragraph, it contains legal conclusions to which no  
21 response is required. To the extent any response is required, Defendants lack  
22 knowledge or information sufficient to form a belief as to the truth of the allegations  
23 contained in Paragraph 372, and on that basis deny each and every allegation  
24 contained therein.

25           373. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 373, and on that basis deny each  
27 and every allegation contained therein.

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1           374. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 374, and on that basis deny each  
3 and every allegation contained therein.

4           375. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 375, and on that basis deny each  
6 and every allegation contained therein.

7           376. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 376, and on that basis deny each  
9 and every allegation contained therein.

10          377. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 377, and on that basis deny each  
12 and every allegation contained therein.

13          378. This Paragraph of the Third Amended Complaint is vague, ambiguous,  
14 and/or indecipherable, such that Defendants lack knowledge or information sufficient  
15 to form a belief as to the truth of the allegations contained in Paragraph 378 and on  
16 that basis deny each and every allegation contained therein. To the extent Defendants  
17 are able to understand this Paragraph, it contains legal conclusions to which no  
18 response is required. To the extent any response is required, Ms. Dean denies the  
19 allegations in this Paragraph. Songs of Universal lacks knowledge or information  
20 sufficient to form a belief as to the truth of the allegations contained in Paragraph 378,  
21 and on that basis denies each and every allegation contained therein.

22          379. This Paragraph of the Third Amended Complaint is vague, ambiguous,  
23 and/or indecipherable, such that Defendants lack knowledge or information sufficient  
24 to form a belief as to the truth of the allegations contained in Paragraph 379 and on  
25 that basis deny each and every allegation contained therein. To the extent Defendants  
26 are able to understand this Paragraph, it contains legal conclusions to which no  
27 response is required. To the extent any response is required, Ms. Dean denies the  
28 allegations in this Paragraph. Songs of Universal lacks knowledge or information

1 sufficient to form a belief as to the truth of the allegations contained in Paragraph 379,  
2 and on that basis denies each and every allegation contained therein.

3 380. Defendants lack knowledge or information sufficient to form a belief as  
4 to the truth of the allegations contained in Paragraph 380, and on that basis deny each  
5 and every allegation contained therein.

6 381. This Paragraph of the Third Amended Complaint sets forth allegations  
7 against certain other defendants, as well as all defendants in this action collectively.  
8 Defendants are without knowledge or information sufficient to form a belief as to the  
9 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
10 on that basis deny those allegations. As to allegations pertaining specifically to  
11 Defendants in this Paragraph 381, Defendants deny any such allegations.

12 382. This Paragraph of the Third Amended Complaint sets forth allegations  
13 against certain other defendants, as well as all defendants in this action collectively.  
14 Defendants are without knowledge or information sufficient to form a belief as to the  
15 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
16 on that basis deny those allegations. As to allegations pertaining specifically to  
17 Defendants in this Paragraph 382, Defendants deny any such allegations.

### 18 **“Count III**

#### 19 **“Contributory Copyright Infringement”**

20 383. Defendants re-allege and incorporate herein by reference their responses  
21 to Paragraphs 1 through 382 above, inclusive, as though fully set forth herein.

22 384. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 384, and on that basis deny each  
24 and every allegation contained therein.

25 385. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 385, and on that basis deny each  
27 and every allegation contained therein.

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1           386. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 386, and on that basis deny each  
3 and every allegation contained therein.

4           387. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 387, and on that basis deny each  
6 and every allegation contained therein.

7           388. Paragraph 388 contains legal conclusions to which no response is  
8 required. To the extent any response is required, Songs of Universal denies the  
9 allegations in Paragraph 388. Ms. Dean lacks knowledge or information sufficient to  
10 form a belief as to the truth of the allegations contained in Paragraph 388, and on that  
11 basis denies each and every allegation contained therein.

12           389. Paragraph 389 contains legal conclusions to which no response is  
13 required. To the extent any response is required, Songs of Universal denies the  
14 allegations in Paragraph 389. Ms. Dean lacks knowledge or information sufficient to  
15 form a belief as to the truth of the allegations contained in Paragraph 389, and on that  
16 basis denies each and every allegation contained therein.

17           390. Paragraph 390 contains legal conclusions to which no response is  
18 required. To the extent any response is required, Defendants lack knowledge or  
19 information sufficient to form a belief as to the truth of the allegations contained in  
20 Paragraph 390, and on that basis deny each and every allegation contained therein.

21           391. Paragraph 391 contains legal conclusions to which no response is  
22 required. To the extent any response is required, Defendants lack knowledge or  
23 information sufficient to form a belief as to the truth of the allegations contained in  
24 Paragraph 391, and on that basis deny each and every allegation contained therein.

25           392. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 392, and on that basis deny each  
27 and every allegation contained therein.

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1           393. Defendants lack knowledge or information sufficient to form a belief as  
2 to the truth of the allegations contained in Paragraph 393, and on that basis deny each  
3 and every allegation contained therein.

4           394. Defendants lack knowledge or information sufficient to form a belief as  
5 to the truth of the allegations contained in Paragraph 394, and on that basis deny each  
6 and every allegation contained therein.

7           395. Defendants lack knowledge or information sufficient to form a belief as  
8 to the truth of the allegations contained in Paragraph 395, and on that basis deny each  
9 and every allegation contained therein.

10          396. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 396, and on that basis deny each  
12 and every allegation contained therein.

13          397. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 397, and on that basis deny each  
15 and every allegation contained therein.

16          398. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 398, and on that basis deny each  
18 and every allegation contained therein.

19          399. Defendants lack knowledge or information sufficient to form a belief as  
20 to the truth of the allegations contained in Paragraph 399, and on that basis deny each  
21 and every allegation contained therein.

22          400. Defendants lack knowledge or information sufficient to form a belief as  
23 to the truth of the allegations contained in Paragraph 400, and on that basis deny each  
24 and every allegation contained therein.

25          401. Defendants lack knowledge or information sufficient to form a belief as  
26 to the truth of the allegations contained in Paragraph 401, and on that basis deny each  
27 and every allegation contained therein.

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1           402. Paragraph 402 contains legal conclusions to which no response is  
2 required. To the extent any response is required, Ms. Dean denies the allegations in  
3 Paragraph 402. Ms. Dean lacks knowledge or information sufficient to form a belief  
4 as to the truth of the allegations contained in Paragraph 402, and on that basis denies  
5 each and every allegation contained therein.

6           403. Paragraph 403 contains legal conclusions to which no response is  
7 required. To the extent any response is required, Ms. Dean denies the allegations in  
8 Paragraph 403. Ms. Dean lacks knowledge or information sufficient to form a belief  
9 as to the truth of the allegations contained in Paragraph 403, and on that basis denies  
10 each and every allegation contained therein.

11           404. Paragraph 404 contains legal conclusions to which no response is  
12 required. To the extent any response is required, Ms. Dean denies the allegations in  
13 Paragraph 404. Ms. Dean lacks knowledge or information sufficient to form a belief  
14 as to the truth of the allegations contained in Paragraph 404, and on that basis denies  
15 each and every allegation contained therein.

16           405. Paragraph 405 contains legal conclusions to which no response is  
17 required. To the extent any response is required, Ms. Dean denies the allegations in  
18 Paragraph 405. Ms. Dean lacks knowledge or information sufficient to form a belief  
19 as to the truth of the allegations contained in Paragraph 405, and on that basis denies  
20 each and every allegation contained therein.

21           406. Defendants lack knowledge or information sufficient to form a belief as  
22 to the truth of the allegations contained in Paragraph 406, and on that basis deny each  
23 and every allegation contained therein.

24           407. Defendants lack knowledge or information sufficient to form a belief as  
25 to the truth of the allegations contained in Paragraph 407, and on that basis deny each  
26 and every allegation contained therein.

27           408. This Paragraph of the Third Amended Complaint sets forth allegations  
28 against certain other defendants, as well as all defendants in this action collectively.

1 Defendants are without knowledge or information sufficient to form a belief as to the  
2 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
3 on that basis deny those allegations. As to allegations pertaining specifically to  
4 Defendants in this Paragraph 408, Defendants deny any such allegations.

5 409. This Paragraph of the Third Amended Complaint sets forth allegations  
6 against certain other defendants, as well as all defendants in this action collectively.  
7 Defendants are without knowledge or information sufficient to form a belief as to the  
8 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
9 on that basis deny those allegations. As to allegations pertaining specifically to  
10 Defendants in this Paragraph 409, Defendants deny any such allegations.

11 410. This Paragraph of the Third Amended Complaint sets forth allegations  
12 against certain other defendants, as well as all defendants in this action collectively.  
13 Defendants are without knowledge or information sufficient to form a belief as to the  
14 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
15 on that basis deny those allegations. As to allegations pertaining specifically to  
16 Defendants in this Paragraph 410, Defendants deny any such allegations.

17 411. This Paragraph of the Third Amended Complaint sets forth allegations  
18 against certain other defendants, as well as all defendants in this action collectively.  
19 Defendants are without knowledge or information sufficient to form a belief as to the  
20 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
21 on that basis deny those allegations. As to allegations pertaining specifically to  
22 Defendants in this Paragraph 411, Defendants deny any such allegations.

23 412. This Paragraph of the Third Amended Complaint sets forth allegations  
24 against certain other defendants, as well as all defendants in this action collectively.  
25 Defendants are without knowledge or information sufficient to form a belief as to the  
26 truth of the allegations of this Paragraph as to defendants other than Defendants, and  
27 on that basis deny those allegations. As to allegations pertaining specifically to  
28 Defendants in this Paragraph 412, Defendants deny any such allegations.

**“Count IV**

## **“Falsification and Removal of CMI (17 U.S.C. § 1202 et seq.)”**

12           415. Paragraph 415 contains legal conclusions to which no response is  
13 required. To the extent any response is required, this Paragraph of the Third Amended  
14 Complaint sets forth allegations against all defendants and is vague, ambiguous,  
15 subject to more than one interpretation, incomprehensible, and/or indecipherable,  
16 including without limitation in its use of the phrase “digital music contains CMI,”  
17 such that Defendants are without knowledge or information sufficient to form a belief  
18 as to the truth of the allegations of this Paragraph 415 and on that basis deny each and  
19 every allegation contained therein.

416. Paragraph 416 contains legal conclusions to which no response is required. To the extent any response is required, this Paragraph of the Third Amended Complaint sets forth allegations against certain other defendants. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph as to defendants other than Defendants, and on that basis deny those allegations. As to allegations pertaining specifically to Defendants in this Paragraph 416, Defendants admit that CMI is sometimes used to identify the owners of and to protect digital music works, and deny the remaining allegations.

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1           417. Paragraph 417 contains legal conclusions to which no response is  
2 required. To the extent any response is required, this Paragraph of the Third Amended  
3 Complaint sets forth allegations against certain other defendants. Defendants are  
4 without knowledge or information sufficient to form a belief as to the truth of the  
5 allegations of this Paragraph as to defendants other than Defendants, and on that basis  
6 deny those allegations. As to allegations pertaining specifically to Defendants in this  
7 Paragraph 417, Defendants admit that CMI is sometimes used by them, or by others  
8 with respect to their works, to identify and protect their works, and deny the remaining  
9 allegations.

10           418. Defendants lack knowledge or information sufficient to form a belief as  
11 to the truth of the allegations contained in Paragraph 418, and on that basis deny each  
12 and every allegation contained therein.

13           419. Defendants lack knowledge or information sufficient to form a belief as  
14 to the truth of the allegations contained in Paragraph 419, and on that basis deny each  
15 and every allegation contained therein.

16           420. Defendants lack knowledge or information sufficient to form a belief as  
17 to the truth of the allegations contained in Paragraph 420, and on that basis deny each  
18 and every allegation contained therein.

19           421. This Paragraph of the Third Amended Complaint sets forth allegations  
20 against certain other defendants. Defendants are without knowledge or information  
21 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
22 defendants other than Defendants, and on that basis deny those allegations. As to  
23 allegations pertaining specifically to Defendants in this Paragraph 421, Defendants  
24 deny any such allegations.

25           422. This Paragraph of the Third Amended Complaint sets forth allegations  
26 against certain other defendants. Defendants are without knowledge or information  
27 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
28 defendants other than Defendants, and on that basis deny those allegations. As to

1 allegations pertaining specifically to Defendants in this Paragraph 422, Defendants  
2 deny any such allegations.

3 423. This Paragraph of the Third Amended Complaint sets forth allegations  
4 against certain other defendants. Defendants are without knowledge or information  
5 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
6 defendants other than Defendants, and on that basis deny those allegations. As to  
7 allegations pertaining specifically to Defendants in this Paragraph 423, Defendants  
8 deny any such allegations.

9 424. This Paragraph of the Third Amended Complaint sets forth allegations  
10 against certain other defendants. Defendants are without knowledge or information  
11 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
12 defendants other than Defendants, and on that basis deny those allegations. As to  
13 allegations pertaining specifically to Defendants in this Paragraph 424, Defendants  
14 deny any such allegations.

15 425. This Paragraph of the Third Amended Complaint sets forth allegations  
16 against certain other defendants. Defendants are without knowledge or information  
17 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
18 defendants other than Defendants, and on that basis deny those allegations. As to  
19 allegations pertaining specifically to Defendants in this Paragraph 425, Defendants  
20 deny any such allegations.

21 426. This Paragraph of the Third Amended Complaint sets forth allegations  
22 against certain other defendants. Defendants are without knowledge or information  
23 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
24 defendants other than Defendants, and on that basis deny those allegations. As to  
25 allegations pertaining specifically to Defendants in this Paragraph 426, Defendants  
26 deny any such allegations.

27 427. This Paragraph of the Third Amended Complaint sets forth allegations  
28 against certain other defendants. Defendants are without knowledge or information

1 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
2 defendants other than Defendants, and on that basis deny those allegations. As to  
3 allegations pertaining specifically to Defendants in this Paragraph 427, Defendants  
4 deny any such allegations.

5 428. This Paragraph of the Third Amended Complaint sets forth allegations  
6 against certain other defendants. Defendants are without knowledge or information  
7 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
8 defendants other than Defendants, and on that basis deny those allegations. As to  
9 allegations pertaining specifically to Defendants in this Paragraph 428, Defendants  
10 deny any such allegations.

11 429. This Paragraph of the Third Amended Complaint sets forth allegations  
12 against certain other defendants. Defendants are without knowledge or information  
13 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
14 defendants other than Defendants, and on that basis deny those allegations. As to  
15 allegations pertaining specifically to Defendants in this Paragraph 429, Defendants  
16 deny any such allegations.

17 430. This Paragraph of the Third Amended Complaint sets forth allegations  
18 against certain other defendants. Defendants are without knowledge or information  
19 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
20 defendants other than Defendants, and on that basis deny those allegations. As to  
21 allegations pertaining specifically to Defendants in this Paragraph 430, Defendants  
22 deny any such allegations.

23 431. This Paragraph of the Third Amended Complaint sets forth allegations  
24 against certain other defendants. Defendants are without knowledge or information  
25 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
26 defendants other than Defendants, and on that basis deny those allegations. As to  
27 allegations pertaining specifically to Defendants in this Paragraph 431, Defendants  
28 deny any such allegations.



**“Count V**

**“Contributory Liability Under 17 U.S.C. § 1202 et seq.”**

432. Defendants re-allege and incorporate herein by reference their responses to Paragraphs 1 through 431 above, inclusive, as though fully set forth herein.

433. This Paragraph of the Third Amended Complaint sets forth allegations against certain other defendants. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph as to defendants other than Defendants, and on that basis deny those allegations. As to allegations pertaining specifically to Defendants in this Paragraph 433, Defendants deny any such allegations.

434. This Paragraph of the Third Amended Complaint sets forth allegations against certain other defendants. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph as to defendants other than Defendants, and on that basis deny those allegations. As to allegations pertaining specifically to Defendants in this Paragraph 434, Defendants deny any such allegations.

435. This Paragraph of the Third Amended Complaint sets forth allegations against certain other defendants. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph as to defendants other than Defendants, and on that basis deny those allegations. As to allegations pertaining specifically to Defendants in this Paragraph 435, Defendants deny any such allegations.

436. This Paragraph of the Third Amended Complaint sets forth allegations against certain other defendants and defendants collectively. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations of this Paragraph as to defendants other than Defendants, and on that basis deny those allegations. As to allegations pertaining specifically to Defendants in this Paragraph 436, Defendants deny any such allegations.

7            438. This Paragraph of the Third Amended Complaint sets forth allegations  
8 against certain other defendants and defendants collectively. Defendants are without  
9 knowledge or information sufficient to form a belief as to the truth of the allegations  
10 of this Paragraph as to defendants other than Defendants, and on that basis deny those  
11 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
12 438, Defendants deny any such allegations.

13            439. This Paragraph of the Third Amended Complaint sets forth allegations  
14 against certain other defendants and defendants collectively. Defendants are without  
15 knowledge or information sufficient to form a belief as to the truth of the allegations  
16 of this Paragraph as to defendants other than Defendants, and on that basis deny those  
17 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
18 439, Defendants deny any such allegations.

19            440. This Paragraph of the Third Amended Complaint sets forth allegations  
20 against certain other defendants and defendants collectively. Defendants are without  
21 knowledge or information sufficient to form a belief as to the truth of the allegations  
22 of this Paragraph as to defendants other than Defendants, and on that basis deny those  
23 allegations. As to allegations pertaining specifically to Defendants in this Paragraph  
24 440, Defendants deny any such allegations.

25 “Count VI

441. Defendants re-allege and incorporate herein by reference their responses  
to Paragraphs 1 through 440 above, inclusive, as though fully set forth herein.

1           442. This Paragraph of the Third Amended Complaint sets forth allegations  
2 against certain other defendants. Defendants are without knowledge or information  
3 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
4 defendants other than Defendants, and on that basis deny those allegations. As to  
5 allegations pertaining specifically to Defendants in this Paragraph 442, Defendants  
6 deny any such allegations.

7           443. This Paragraph of the Third Amended Complaint sets forth allegations  
8 against certain other defendants. Defendants are without knowledge or information  
9 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
10 defendants other than Defendants, and on that basis deny those allegations. As to  
11 allegations pertaining specifically to Defendants in this Paragraph 443, Defendants  
12 deny any such allegations.

13           444. This Paragraph of the Third Amended Complaint sets forth allegations  
14 against certain other defendants. Defendants are without knowledge or information  
15 sufficient to form a belief as to the truth of the allegations of this Paragraph as to  
16 defendants other than Defendants, and on that basis deny those allegations. As to  
17 allegations pertaining specifically to Defendants in this Paragraph 444, Defendants  
18 deny any such allegations.

19                           **“DEMAND FOR JURY TRIAL”**

20           445. Defendants admit that Plaintiff has demanded a trial by jury on all issues  
21 triable. Defendants further deny that Plaintiff is entitled to the relief requested by the  
22 Third Amended Complaint, or any other relief whatsoever.

23                           **AFFIRMATIVE DEFENSES**

24           Defendants do not presently know all of the facts and circumstances relating to  
25 Plaintiff’s claims, and reserve the right to amend this Answer, including but not  
26 limited to amending to add different or additional affirmative defenses. Subject to the  
27 foregoing, and without waiving or excusing Plaintiff’s burden of proof, or admitting  
28 that any of the following are in fact affirmative defenses upon which Defendants have

1 any burden of proof, as opposed to denials of matters as to which Plaintiff has the  
2 burden of proof, or that Defendants have any burden of proof at all, Defendants hereby  
3 assert the following affirmative defenses.

4 **FIRST AFFIRMATIVE DEFENSE**

5 **(Failure to State a Claim)**

6 446. Plaintiff's Third Amended Complaint fails to state a claim upon which  
7 relief may be granted.

8 **SECOND AFFIRMATIVE DEFENSE**

9 **(Independent Creation)**

10 447. The allegedly infringing works were created independently of the  
11 allegedly infringed works.

12 **THIRD AFFIRMATIVE DEFENSE**

13 **(Lack of Originality or Protectability)**

14 448. The allegedly copied elements or materials lack originality or otherwise  
15 are not protected by copyright.

16 **FOURTH AFFIRMATIVE DEFENSE**

17 **(Plaintiff's Lack of Ownership of the Allegedly Copied Material)**

18 449. Plaintiff does not own the allegedly infringed copyrights, or either of  
19 them, or any other rights in or to the portions of the claimed works that are allegedly  
20 copied.

21 **FIFTH AFFIRMATIVE DEFENSE**

22 **(Alleged Infringement De Minimis)**

23 450. Without admitting the use of any copyrighted material allegedly owned  
24 by Plaintiff, which is denied, the alleged use is de minimis.

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1                                   **SIXTH AFFIRMATIVE DEFENSE**

2                                   **(Failure to Comply with Copyright Act Formalities)**

3           451. Plaintiff's claims and/or the remedies Plaintiff seeks are barred by the  
4 failure to comply with the Copyright Act of 1976, 17 U.S.C. §§ 101 *et seq.*, including  
5 but not limited to 17 U.S.C. §§ 401 and 408, and each of them.

6                                   **SEVENTH AFFIRMATIVE DEFENSE**

7                                   **(Fair Use)**

8           452. Without admitting the alleged use of any copyrighted material allegedly  
9 owned by Plaintiff, which is denied, the conduct of which Plaintiff complains  
10 constitutes fair use.

11                                  **EIGHTH AFFIRMATIVE DEFENSE**

12                                  **(Plaintiff's Lack of Standing)**

13           453. Plaintiff lacks standing to assert the claims that Plaintiff alleges in this  
14 action.

15                                  **NINTH AFFIRMATIVE DEFENSE**

16                                  **(Abandonment)**

17           454. Plaintiff abandoned the copyrights, or the allegedly infringed copyright  
18 rights, in the allegedly infringed works.

19                                  **TENTH AFFIRMATIVE DEFENSE**

20                                  **(Waiver)**

21           455. Plaintiff's claims and/or the remedies Plaintiff seeks are barred by the  
22 doctrine of waiver.

23                                  **ELEVENTH AFFIRMATIVE DEFENSE**

24                                  **(License)**

25           456. Without admitting the use of any copyrighted material allegedly owned  
26 by Plaintiff, which is denied, the conduct of which Plaintiff complains was impliedly  
27 and/or expressly licensed.

28   ///

**TWELFTH AFFIRMATIVE DEFENSE**

**(Innocent Infringement)**

457. Without admitting any infringement, which is denied, the alleged infringements were innocent.

**THIRTEENTH AFFIRMATIVE DEFENSE**

**(Statutes of Limitation)**

458. The alleged infringements, or the remedies Plaintiff seeks, or Plaintiff's claim of authorship or ownership of the allegedly infringed copyrights, and each of them, are barred in whole or part by statutes of limitation, including, *inter alia*, 17 U.S.C. § 507(b).

**FOURTEENTH AFFIRMATIVE DEFENSE**

**(Estoppel, Laches, and/or Acquiescence)**

459. Plaintiff's claims and/or the remedies Plaintiff seeks are barred, in whole or part, by the equitable doctrines of estoppel, laches, and/or acquiescence.

**FIFTEENTH AFFIRMATIVE DEFENSE**

**(Failure to Allege Required Elements of Section 1202 Claim)**

460. Plaintiff fails to state a claim under Section 1202 of the Copyright Act upon which relief can be granted, including, but not limited to, (a) because he has failed to plead any facts supporting his allegation that Defendants used the works at issue with the intent to induce, enable, facilitate, or conceal infringement; (b) because he has failed to identify or establish that copyright management information was included in the works at issue and/or when they were allegedly copied; and/or (c) because he has failed to sufficiently allege that anything allegedly added to the works at issue constitutes copyright management information.

**SIXTEENTH AFFIRMATIVE DEFENSE**

**(Lack of Access)**

461. Plaintiff's claims are barred because the creators of the allegedly infringing works did not have access to and did not copy Plaintiff's works.





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**DEMAND FOR JURY TRIAL**

Defendants Esther Renay Dean, also sued as Dat Damn Dean, and Songs of Universal, Inc., respectfully demand trial by jury.

Dated: May 3, 2024

\_\_\_\_\_  
/s/ Peter Anderson  
Peter Anderson, Esq.  
Joseph Elie-Meyers, Esq.  
DAVIS WRIGHT TREMAINE LLP  
Attorneys for Defendants  
ESTHER RENAY DEAN,  
also sued as Dat Damn Dean, and  
SONGS OF UNIVERSAL, INC.